



March 12, 2014

State of New Jersey  
Department of the Treasury  
Division of Purchase and Property  
P.O. Box 230  
Trenton, NJ 08625-0230

*Submitted VIA email*

**ATTENTION: Mr. Judson Cross**  
judson.cross@treas.state.nj.us

**SUBJECT: Request for Best and Final Offer (BAFO) for RFQ846094S Program Manager Contractor of Environmental and Historic Preservation Reviews, New Jersey's CDBG-DR Grant Program Contractors**

Dear Mr. Cross:

ICF Incorporated, L.L.C., is pleased to provide this BAFO for ICF's proposal 2014\_0182 in response to your letter dated March 7, 2014.

Per the requirements outlined in your letter, the Revised Cost Quote Price Schedule 1 Program Manager, Firm Fixed Pricing (Revised Price Schedule 1), and Revised Cost Quote Price Schedule 2 Program Manager, All-Inclusive Hourly Rate Pricing (Revised Price Schedule 2) are attached hereto. We have also included a restatement of the commitments made in the original submission.

Although we believe our original price was highly competitive and fairly represents the costs associated with delivering the Services outlined in the statement of work (the "SOW") for the firm fixed price portion of this contract, through another review of the SOW, ICF identified additional efficiencies and has decreased its price by more than half of one million dollars (\$500,000). In addition, we discounted our labor category rates, which allowed ICF to offer the State additional cost savings under the All-Inclusive Hourly Rate portion of this effort.

Lastly, ICF is restating the commitments provided in our original submission:

- This letter and Quote is signed by a person that is authorized to bind the company.
- ICF's proposal remains valid for a period of sixty (60) days from the BAFO submission date of March 12, 2014. ICF retains the right to review its submission and to extend its offer or to revise its proposal at the end of the sixty (60) day period.
- ICF is licensed to do business in New Jersey under New Jersey Business Registration Certificate number 1048914.
- In the past 5 years, ICF has not had a record of substandard work, nor has ICF engaged in any unethical practices.
- If awarded, ICF acknowledges its understanding of the scope of work to be performed and its complete responsibility for the entire contract, including payment of any and all charges resulting from the contract.
- The New Jersey Standard Terms and Conditions are herein accepted and a signed copy is attached in Tab 11 of our proposal.
- ICF affirms that no key team member, subcontractors or its key members are listed on any State or Federal suspension, debarment or disqualification list.



- In accordance with RFQ Section 4.1.13 CONFLICT OF INTEREST DISCLOSURE, ICF and our principals have no ownership interest in any firm that is an EAF Contractor. ICF commits to not acquiring an interest in an EAF Contractor for the duration of our performance.
- ICF's Federal Tax ID is [REDACTED]

We look forward to hearing from you about the status of our proposal and sharing additional information as needed in written or oral presentations. For technical questions, please contact David Freytag at [REDACTED] or via email at [REDACTED]. For contractual questions, please contact Evan Goldstein at [REDACTED] or via email at [REDACTED].

Sincerely,

A handwritten signature in blue ink that reads "J. Donley".

Julia C. Donley  
Vice President, Contracts & Administration

Enclosures

**BAFO Cost Quotation Price Schedules - Pricing for services required under this RFQ will be a blend of firm fixed rates and all-inclusive hourly rates. Bidders must complete all price cells within the Price Schedule or be deemed non-responsive. Bidders should not provide pricing in cells marked "N/A".**

**Cost Quotation Price Schedule 1 Project Manager - Firm Fixed Pricing**

Line No.	Description	Unit	Quantity (A)	Year 1 (B)	Year 1 Total (A) * (B)	Year 2 (C)	Year 2 Total (A) * (C)	Year 3 (D)	Year 3 Total (A) * (D)
1	Core Program Management -Start-up Section 3.1.1.3	Task	1	\$ 201,538	\$ 201,538	N/A	N/A	N/A	N/A
2	Core Program Management Operations Sections 3.1.1.2; 3.1.2; 3.1.3; 3.1.4; 3.3.1; 3.3.2; 3.41.; 3.4.3; 3.4.6 thru 3.4.8	Month	12	\$ 691,165	\$ 8,293,980	\$ 148,704	\$ 1,784,448	\$ 105,364	\$ 1,264,368
3	Core Program Management Operations - State Historic Preservation Office Section 3.2.1	Month	12	\$ 148,170	\$ 1,778,040	\$ 138,725	\$ 1,664,700	\$ 142,873	\$ 1,714,476
4	Training Section 3.3.3	Task	1	\$ 13,453	\$ 13,453	\$ -	\$ -	\$ -	\$ -
5	Document Management & Retention Section 3.4.5	Month	12	\$ 16,367	\$ 196,404	\$ 16,067	\$ 192,804	\$ 16,526	\$ 198,312

**BAFO Cost Quotation Price Schedule 2 Program Manager - All-Inclusive Hourly Rate Pricing**

A bidder MUST fit its existing personnel and that of proposed subcontractors into the following Labor Titles.

Line No.	Labor Title	Hourly Rate Year 1	Hourly Rate Year 2	Hourly Rate Year 3
<b>Office, Management, and IT Staff</b>				
6	Project Manager	\$ 193.96	\$ 199.78	\$ 205.77
7	Assistant Project Manager	\$ 158.50	\$ 163.25	\$ 168.15
8	Company Chief Executive	\$ 249.36	\$ 256.84	\$ 264.55
9	Program Development Specialist	\$ 168.41	\$ 173.46	\$ 178.66
10	Facilities Operations Manager	\$ 119.57	\$ 123.16	\$ 126.85
11	Information Technology Manager	\$ 169.39	\$ 174.47	\$ 179.70
12	Data Base Manager	\$ 150.27	\$ 154.78	\$ 159.42
13	Programmer 1 – Senior Level	\$ 111.38	\$ 114.72	\$ 118.16
14	Programmer 2 – Junior Level	\$ 75.04	\$ 77.29	\$ 79.61
15	Administrative Support Staff/Data Entry	\$ 58.87	\$ 60.64	\$ 62.46
16	Chief Accountant	\$ 167.28	\$ 172.30	\$ 177.47
17	Staff Accountant	\$ 103.51	\$ 106.61	\$ 109.81
18	Accounting Assistant	\$ 58.34	\$ 60.09	\$ 61.89
19	Contract Manager	\$ 142.33	\$ 146.60	\$ 151.00
20	Historic Preservation Specialist 1	\$ 163.86	\$ 168.78	\$ 173.84
21	Historic Preservation Specialist 2	\$ 109.64	\$ 112.92	\$ 116.31
22	Architect	\$ 177.65	\$ 182.98	\$ 188.47





Request for Quotation (RFQ) for

Program Manager Contractor of  
Environmental and Historic  
Preservation Reviews New  
Jersey's CDBG-DR Grant  
Program Contractors  
RFQ846094S

State of New Jersey, Department of the  
Treasury, Division of Purchase and  
Property

Friday, February 21, 2014

Submitted by:

ICF Incorporated, L.L.C.

9300 Lee Highway, Fairfax, VA 22031 (703) 934-3000

Federal Tax ID Number: 52-0893615

Authorized Contact:

Julia Donley, Vice President

9300 Lee Highway, Fairfax, VA 22031

(703) 934-3384 (t)/(703) 218-2547 (f)

[julia.donley@icfi.com](mailto:julia.donley@icfi.com)

This proposal includes proprietary information clearly identified on select pages. Material identified as proprietary shall not be disclosed outside the Client and shall not be duplicated, used, or disclosed for any purpose other than to evaluate this proposal. If, however, a contract is awarded to this offerer as a result of—or in conjunction with—the submission of these data, the Client shall have the right to duplicate, use, or disclose the data to the extent provided in the resulting contract.



February 21, 2014

State of New Jersey  
Department of the Treasury  
Division of Purchase and Property  
P.O. Box 230  
Trenton, NJ 08625-0230

*Submitted VIA GSA eBuy*

**ATTENTION: Mr. Judson Cross**  
judson.cross@treas.state.nj.us

**REFERENCE: ICF Proposal 2014\_0182**

**SUBJECT: RFQ846094S for Program Manager Contractor of Environmental and Historic Preservation Reviews, New Jersey's CDBG-DR Grant Program Contractors**

Dear Mr. Cross:

ICF Incorporated, L.L.C., is pleased to provide this proposal in response to the subject Request for Quote.

The unprecedented damage caused by Superstorm Sandy to New Jersey's housing, business, infrastructure, health, social service, and environmental sectors has placed enormous pressures on the State to facilitate the distribution of recovery aid in a timely manner. With Federal assistance comes complex rules for environmental review, historic preservation studies, compliance with building codes and elevation rules, and other requirements that present challenges. Providing Community Development Block Grant – Disaster Recovery (CDBG-DR) assistance quickly while complying with Federal environmental requirements will be in dynamic tension.

ICF is the best firm to help the Department of Environmental Protection (DEP) balance that tension between expediency, accuracy, and compliance. Our team members bring unmatched expertise that will enable DEP to achieve the goals of the contract efficiently and effectively for the following reasons:

- **Our Project Manager's recent work with DEP and the Department of Community Affairs (DCA) on the implementation of the programs outlined in the State's Action Plan means we have already hit the ground running for a seamless startup process.** Scott Ledford, our proposed Project Manager, and our core management team, including Neil Sullivan and Richard Starzak, have been working in New Jersey since early 2013 to assist with initial process flows and CDBG program design considerations, including environmental review and Section 106 compliance processes.
- **Our history of success with the U.S. Department of Housing and Urban Development (HUD) will enable DEP to complete all documentation and reviews to HUD's satisfaction.** ICF has been working with HUD on the CDBG program since 1987. Two of our key team members, Charlie Bien and Cathy Dymkoski, are former HUD officers responsible for establishing 24 CFR Part 50 and Part 58 review requirements. Our staff has provided training courses on environmental compliance with HUD regulations and has successfully performed reviews on complex and controversial projects.



- **Our streamlined Section 106 compliance methods will allow DEP to complete the process quickly while maintaining accuracy.** We bring a Historic Preservation Manager, Richard Starzak, who has conducted Section 106 and State Historic Preservation Office consultation in 44 states, including New Jersey. He has been instrumental in developing a streamlined system for compliance that has expedited the process and saved our clients on consultant costs.
- **From day one, ICF can begin assessing the more than 2,600 environmental documents already completed.** ICF has not served as an EAF Contractor, thus eliminating the need to recuse ourselves for review of any of the documents. Neil Sullivan and his team are familiar with the documentation being prepared having helped DEP develop the HUD compliance strategy for this program.
- **Our success in leading other CDBG-DR programs enables us to anticipate challenges and draw on our experience to recommend proven solutions to DEP.** Our team has written CDBG program training guides, supported states receiving CDBG funding. We have worked with the Federal Emergency Management Agency (FEMA) since 2000, including projects requiring compliance with FEMA's 44 CFR Part 10 regulations.
- **As one of the nation's leading environmental consulting firms for more than 40 years, we provide a host of NEPA compliance best practices.** ICF was one of the first firms to begin providing clients with NEPA compliance consultation. We have completed thousands of legally defensible NEPA documents and delivered hundreds of NEPA compliance courses across the country to federal, state, and local agencies.

Our current support to DEP and DCA in New Jersey, coupled with our unparalleled knowledge of HUD and other federal regulations; our depth of staff, skills, and expertise; and our established management approach will enable DEP to ensure a fully compliant environmental review process for Superstorm Sandy recovery.

Per the solicitation requirements, the following information is provided:

- This letter and Quote is signed by a person that is authorized to bind the company.
- ICF's proposal remains valid for a period of 60 days. ICF retains the right to review its submission and to extend its offer or to revise its proposal at the end of the sixty (60) day period.
- ICF is licensed to do business in New Jersey under New Jersey Business Registration Certificate number 1048914.
- In the past 5 years, ICF has not had a record of substandard work, nor has ICF engaged in any unethical practices.
- If awarded, ICF acknowledges its understanding of the scope of work to be performed and its complete responsibility for the entire contract, including payment of any and all charges resulting from the contract.
- The New Jersey Standard Terms and Conditions are herein accepted and a signed copy is attached in Tab 11 of our proposal.
- ICF affirms that no key team member, subcontractors or its key members are listed on any State or Federal suspension, debarment or disqualification list.
- This proposal contains proprietary information related to our Cost Quote in Tab 11.
- In accordance with RFQ Section 4.1.13 CONFLICT OF INTEREST DISCLOSURE, ICF and our principals have no ownership interest in any firm that is an EAF Contractor. ICF commits to not acquiring an interest in an EAF Contractor for the duration of our performance.
- ICF's Federal Tax ID is 52-0893615



To determine if we have a relationship with any other consultants providing consulting services on environmental or disaster recovery services in New Jersey, we reviewed the list of Superstorm Sandy Contracts at <http://www.state.nj.us/treasury/purchase/hurricane-coop.shtml>, as of February 21 2014. To the best of our knowledge the following reflects our relationships with firms on the list:

FIRM	RELATIONSHIP
Louis Berger	Sub and prime Nature of work: environmental planning and documentation (non-Superstorm Sandy or disaster recovery related)
Arcadis	Sub and prime Nature of work: environmental planning and documentation (non-Superstorm Sandy or disaster recovery related)
SAIC	Sub and prime Nature of work: environmental planning and documentation (non-Superstorm Sandy or disaster recovery related)

Furthermore, under contract with the HUD, ICF has provided technical assistance and training related to the CDBG – DR Program to the State of New Jersey. The work for HUD did not involve any assignments related to the preparation of this procurement.

We look forward to hearing from you about the status of our proposal and sharing additional information as needed in written or oral presentations. For technical questions, please contact David Freytag at (949) 333-6616 or via email at [David.Freytag@icfi.com](mailto:David.Freytag@icfi.com). For contractual questions, please contact Evan Goldstein at 703-934-3901 or via email at [Evan.Goldstein@icfi.com](mailto:Evan.Goldstein@icfi.com).

Sincerely,

Julia C. Donley  
Vice President, Contracts & Administration  
Phone: (703)934-3384  
Fax: (703)218-2547  
Email: [Julia.Donley@icfi.com](mailto:Julia.Donley@icfi.com)

Enclosure

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# 1. Management Overview

The unprecedented damage caused by Superstorm Sandy to **New Jersey's housing, business, infrastructure, health, social service, and environmental sectors** has placed enormous pressures on the State to facilitate the distribution of recovery aid to the approximately 40,500 owners of primary residences and more than 15,600 rental units **that sustained "severe" or "major" damage** from the storm, according to classifications made by the U.S. Department of Housing and Urban Development (HUD). Communities like Little Ferry, Lavallette, Brigantine, and Sea Bright saw more than 50% of their households sustain major or severe damage. Businesses all along the Jersey Shore sustained significant wind and water damage, and famed boardwalks dating back 100 years and seaside attractions beloved by generations were destroyed. Sandy **also affected New Jersey's** inland communities such as Irvington, Hoboken, and Woodbridge with significant flooding and issues related to property damage, mold, and asbestos.

## Why ICF?

- Our team includes the former director of HUD's Environmental Review Division and a former HUD environmental officer.
- Team members established 24 CFR Part 50 and Part 58 review requirements and oversaw environmental review compliance at HUD.
- Our management team has been working with DCA and DEP on Sandy recovery since February 2013.
- We have worked with HUD on the CDBG program since 1987 and deliver training on HUD environmental rules.
- We employ more than 4,500 professionals worldwide, more than 500 of whom are experts in HUD programs, NEPA compliance, historic preservation, disaster recovery, and related services.
- Our personnel are already on the ground in New Jersey, and dozens more are ready to deploy immediately.
- We are joined by a team of six subcontractors, all of whom are located in New Jersey and four of whom are small business enterprises.

want more than the program can afford to provide. With assistance, though, comes complex rules for environmental review, historic preservation studies, compliance with

building codes and elevation rules, and other requirements that present challenges. Homeowners living in hotels, or small business owners who cannot open their doors to customers, are likely to have limited patience for the environmental review process and procedures. Providing Community Development Block Grant (CDBG) assistance right and providing it fast will be in dynamic tension.

Based on our skills and experience, ICF is poised to provide the most efficient, effective service to the State of New Jersey Department of Environmental Protection (DEP) to attain speed, accuracy, *and* compliance in serving CDBG beneficiaries. ICF has been a leading environmental consulting firm for more than 40 years, including assisting clients with National Environmental Policy Act (NEPA) and Section 106 compliance. To contribute to a seamless contract startup, we offer a program management team that has been working with the State of New Jersey on Sandy recovery efforts since February 2013. We have been guiding clients through HUD regulations since 1987, thus allowing us to supply DEP with effective compliance strategies that can be applied immediately. We have already written CDBG program training guides, supported states receiving CDBG funding, and literally wrote the book on CDBG program management. In addition, we have worked with the Federal Emergency Management Agency (FEMA) since 2000, including projects requiring compliance with **FEMA's 44 CFR Part 10 regulations**. Furthermore, our exclusive subcontracting partners bring a long history of work with the State of New Jersey and current knowledge of Sandy recovery efforts throughout the state (e.g., Hurricane Sandy Recovery and Resiliency On-Call Contract for NJ Transit).

Our current support to the State of New Jersey Department of Community Affairs (DCA) and DEP, coupled with our unmatched knowledge of regulations; our depth of staff, skills, expertise; and our established management approach will enable DEP to successfully perform and complete all levels of environmental reviews for Superstorm Sandy in a timely manner.

On the following pages, you will find the ICF **Team's technical approach**. Section *1.1 Objectives* provides ICF's understanding of the contract objectives and the primary responsibilities of the contractor. Section *1.2 Core Program Management* introduces our core management staff and operations overview, and Section 1.2 through Section 1.8 describe our approach and level of effort from startup operations (RFQ Section 3.1.1.2) through reporting (RFQ Section 3.4.8).





## 1.1 Understanding Objectives

Since the storm, New Jersey has begun to recover. DCA, with **ICF's technical assistance, developed an action plan** that focused primarily on the nine counties most affected by the storm (Cape May, Atlantic, Ocean, Monmouth, Middlesex, Union, Hudson, Essex, and Bergen) as well as on low- to moderate-income families. This first action plan provided more than \$1.8 billion in CDBG funding for the programs, including the seven programs noted in the RFQ, which will assist homeowners, renters, and businesses along with local government agencies. On January 29 of this year, the State published a draft of a second action plan, which would provide another \$1.5 billion that will increase the number of beneficiaries served and add new programs not contained in the first action plan.

Based on our understanding of the nature of the work, we recognize that DEP is looking for a team that respects the needs of property owners to accomplish their reconstruction as quickly as possible and, at the same time, assures compliance with environmental and historic preservation regulations. To that end, ICF offers DEP a team with the experience to:

1. Manage environmental reviews in a manner that is timely, cost effective, and well documented.
2. Process environmental reviews that are complete and **compliant, meeting HUD's regulations and the guidelines of NEPA.**
3. Integrate a project management system for tracking and **reporting with DEP's Environmental Review Management System (ERMS)** to streamline the application process.
4. Ensure that recordkeeping and documentation meets all CDBG-Disaster Recovery (DR) requirements.
5. Communicate effectively with HUD, FEMA, state government stakeholders, and Federal stakeholders to facilitate policy discussions.
6. Recommend and implement processes improvements to ensure efficient compliance.

**To assist DCA's and DEP's implementation of its CDBG-DR programs, New Jersey issued contracts for Project Manager Contractor and Environmental Assessment Field (EAF) Contractors for Environmental and Historic Reviews.** EAF Contractors were selected based on their understanding of the environmental review requirements and nature of the **work and DEP's objectives for its Sandy recovery programs.**

The primary objectives of this RFQ are to bring on an experienced Program Manager Contractor to (1) evaluate the existing program policies and recommend changes or additions in a detailed set of administrative procedures, and then (2) implement the program components. This work includes providing the technical expertise and staffing to manage and oversee such a program.

### 1.1.1 Meeting Objectives

As the Program Manager, ICF will:

- Conduct an expeditious review of the existing environmental review program currently underway at DEP, and identify and recommend upgrades, modifications, or streamlining processes needed to improve the effectiveness of the program.
- Develop program design and administrative procedures for oversight of EAF Contractors that is consistent with the State's responsibilities.
- Be responsible for the subsequent implementation of the overall Environmental and Historic Preservation Review Program for HUD CDBG-DR programs.
- Be responsible for ensuring any environmental reviews completed prior and subsequent to the **State's** engagement of the EAF Contractor have been conducted and documented by the EAF Contractors in accordance with 24 CFR Part 58, 24 CFR Part 55, 36 CFR Part 800, and 44 CFR Part 10, and all other applicable Federal and state laws.

Further information gathered during the proposal Pre-Bid Conference identified additional support activities to be performed by the Program Manager. As such, ICF will:

- Be responsible for ensuring the environmental reviews prepared by EAF Contractors meet all pertinent environmental requirements (including state and local regulations), are updated based on the **Program Manager's** recommended changes to the program, and are legally sufficient to withstand a HUD audit.
- Ensure that the prior work is entered into ERMS and that those reviews entered into ERMS are incorporated into the information technology (IT) system to be developed by the Program Manager.
- Develop budgets and cash flow projections for implementation of the Environmental and Historic Preservation Review Program on behalf of the State Contract Manager.



To immediately address the needs of DEP in support of New Jersey's recovery from Superstorm Sandy, ICF proposes an integrated team of experienced environmental, historic preservation, HUD CDBG-DR, program management, and IT experts to assist DEP in managing, streamlining, and quality-assuring environmental and historic preservation review operations that will comply with Federal, state, and local requirements. To lead the program alongside DEP, we propose Scott Ledford as our Project Manager. He is already working with the State of New Jersey on the Sandy recovery effort contracted by DCA. He will be supported by Assistant Project Managers Neil Sullivan and Richard Starzak, who have been working with DEP and DCA staff on implementing Superstorm Sandy relief since early 2013. Given their relationship with the State's staff and understanding of

current recovery work, they can hit the ground running from day one.

The ICF Team anticipates an increased tempo of operations when elements from the second action plan filter into the environmental review process. Our team will quickly evaluate overall operations, incorporate the ongoing activities covered in the first action plan, and adjust the program management operations accordingly when applications are received from programs not currently active in the existing environmental review process. Based on the dynamic nature of this effort, periodic surge activities such as these are expected, accounted for, and will be addressed in a program management plan. Exhibit 1-1 illustrates the program management approach we will provide DEP to ensure that all objectives are met as expeditiously as possible.

**EXHIBIT 1-1: OVERVIEW OF ICF'S PROGRAM MANAGEMENT PLAN**

 <b>RECEIVE APPLICATIONS</b>	 <b>MANAGE EAF CONTRACTOR</b>	 <b>ENSURE COMPLIANCE</b>
 <p>Perform Initial QA</p>	 <p>Review EAF Contractor Work Products</p>	 <p>Perform QA/QC</p>
 <p>Evaluate EAF Contractor Workload &amp; Past Performance</p>	 <p>Review by Experts</p>	 <p>Submit ERR Documentation</p>
 <p>Issue Task Order</p>	 <p>Track Deliverables &amp; Payments</p>	 <p>Measure &amp; Improve</p>
<b>MANAGEMENT &amp; IT</b>		
 <p>Program Management</p>	 <p>ICF Program Tracker</p>	 <p>Report Progress</p>



## 1.2 Core Program Management Operations (RFQ Section 3.1.1)

### 1.2.2 Core Management Staff (3.1.1.1)

*Given the high-profile nature and complexity of the program to be conducted, ICF senior management has selected the team that will best meet the needs of the State of New Jersey.* Our core management team, including seven key personnel, offers DEP experienced managers who have handled large, complex, environmental projects and have demonstrated the ability to get things done in short order. To provide the specialized knowledge and labor required to successfully assist DEP, the core management team is joined by staff with subject matter expertise and financial and budgeting experience. We have provided an organizational chart on page 9 to illustrate our team structure.

#### PROGRAM MANAGEMENT

The ICF Team will be led by Scott Ledford, *who is currently providing advisory services to DCA related to CDBG-DR program requirements, policies, and procedures. Last year, he assisted DCA with early CDBG program design considerations and helped develop initial process flows for the Landlord Rental Repair Program (LRRP).* Mr. Ledford will provide DEP with management processes and ideas for building efficiencies into the current environmental review process under this contract.

Mr. Ledford is an expert in disaster recovery and in CDBG-DR and FEMA programs and other high-volume Federal funding programs. He has more than 20 years of experience designing and implementing programs and leading and managing programs, projects, and teams including staff and subcontractors. He served as policy director and program director for major programs such as the Louisiana CDBG-DR Program and the U.S. Department of Agriculture Broadband Initiatives Program (BIP)—both of which provide program management, environmental review, and Federal funding compliance strategies that can be applied to the proposed contract. Mr. Ledford has led his clients in building systems to quickly move applications through the pipeline to process funding without delay while maintaining compliance with Federal regulations. As a contract manager for four HUD field offices, he has delivered consulting services to state and local government officials and non-profit organizations throughout the country on project development, program design, and regulatory compliance associated with CDBG and

other public funding programs. This is the kind of experience necessary for DEP to meet its objectives in a timely manner.

Mr. Ledford will serve as the primary point of contact for DEP and oversee the overall delivery of all services under this contract. He will be joined by a team of managers in the areas requested by DEP in the RFQ—specifically selected because of their experience and ability to:

- Seamlessly assume management of the program
- Recommend practical and effective program modifications
- Quickly implement approved solutions

#### HUD/NEPA ENVIRONMENTAL REVIEWS

Serving as an Assistant Project Manager, Neil Sullivan will lead the HUD/NEPA Environmental Review Team. Mr. Sullivan brings 17 years of experience in environmental impact assessment, local and Federal environmental program management, technical analysis, policy analysis, and strategic planning. He has extensive experience in preparing and reviewing NEPA documents. Currently, Mr. Sullivan is providing environmental technical assistance support to DCA and DEP. His work on that contract

*The support from you and your team has been invaluable to our NSP2 program.*

— Michele Wildman, Michigan State Housing Development Authority

**involves providing guidance on compliance with HUD's environmental regulations at 24 CFR Part 58 for the first \$1.8 billion of Hurricane Sandy relief funding.** In addition, he managed environmental technical assistance support to the **Michigan State Housing Development Agency's (MSHDA's) Neighborhood Stabilization Program (NSP2) program** under a contract with HUD. *Mr. Sullivan's HUD and New Jersey experience will enable him to make a positive impact in ensuring compliance with HUD's regulations from day one, with no learning curve.*

#### HISTORIC PRESERVATION

Richard Starzak will lead the Historic Preservation Team as an Assistant Project Manager. Mr. Starzak has 34 years of experience helping Federal agencies comply with Section 106 of the National Historic Preservation Act (NHPA). *In April 2013, he advised the New Jersey Deputy State Historic Preservation Office (SHPO) on an interim approach to comply with Section 106 until the Programmatic Agreement (PA) was fully executed.* In November 2013, he had



discussions with the New Jersey SHPO staff about mitigation banking for adverse effects on historic properties and provided a strategy on ways to further streamline the PA. Overall, he has conducted Section 106 or SHPO consultation in 44 states for a variety of Federal agencies, including HUD,

*We really appreciate your team's diligence, patience, and pro-active approach. Thanks for keeping on top of this. Your team's efforts are much appreciated. Keep up the good work!*

— Valerie Namba, Weatherization Assistance Program

where he recently provided Section 106 technical assistance consulting for NSP2 in Michigan. He also supported the SHPO reviews for California's Weatherization Assistance Program. Mr. Starzak was instrumental in developing a streamlined system for Section 106 compliance that expedited the process and saved our client on consultant costs. As a veteran of Section 106 review processes, he can provide DEP with methods to save both time and costs while remaining entirely compliant with regulations.

## QUALITY ASSURANCE/QUALITY CONTROL (QA/QC)

We will conduct QA/QC at three levels, requiring the involvement of staff with different expertise and capabilities. At the fundamental level, our environmental review experts will carry out QA/QC of each environmental review application. At the next level, we will conduct programmatic QA/QC to ensure compliance with policy, processes, and procedures.

This programmatic QA/QC will be led by Bon Provenzano, who will develop and implement the QA/QC plan and related procedures. Acting in an Assistant Project Manager role, Mr. Provenzano offers 17 years of experience in the field of program management. *Mr. Provenzano's professional focus on management and quality across multiple disciplines is an asset that will help ensure highly competent QA/QC practices throughout the scope of our contract with DEP and ensure the State will be ready for audits and other reviews.* He has earned professional certifications as a Project Management Professional (PMP), a Graduate Certificate in Program Management, and a Six Sigma Black Belt in quality. He supports the management of resources across project departments, monitors compliance, develops shared documentation such as reporting and monitoring templates, and identifies project management methodology and best

practices. At the third level of QA/QC, Senior HUD Policy Advisors Charlie Bien and Cathy Dymkoski will conduct detailed, substantive technical QA/QC reviews of the assessed and certified applications. With decades of HUD experience between them, Mr. Bien and Ms. Dymkoski will ensure that the Environmental Review Records (ERRs) are compliant with HUD 24 CFR Part 58 and Part 55 requirements.

## IT/DATA MANAGEMENT

The IT/data management function will be led by Bob Gawler acting in an Assistant Project Manager role. Mr. Gawler has more than 15 years of experience providing consulting services to public and private sector clients in the areas of program/project management, systems development, and organizational effectiveness. He is already well acquainted with New Jersey's disaster recovery programs and requirements. In 2013, he supported DCA as Acting Assistant Director for Reporting and Information Management, where he was responsible for mapping out system requirements for reporting and coordinating with the State's IT vendor to implement and test technology solutions to meet program reporting requirements. *Bob's knowledge of DCA's programs means he will require minimal time to familiarize himself with DEP's specific needs.*

## ACCOUNTING AND REPORTING

The accounting and reporting function will be led by Elaine Adams, acting in an Assistant Project Manager role, who has more than 25 years of professional accounting experience as an employee of the City of Trenton. Ms. Adams's **most recent** duties include maintaining **Trenton's \$40-million annual HUD CDBG budget**. She was responsible for monitoring and directing more than 50 specific grants and prepared fiscal reporting for Federal, State, County, and private funders. *Ms. Adams' expert understanding of HUD requirements will help to ensure that accounting and reporting procedures meet Federal compliance regulations.*

## FRAUD, WASTE, AND ABUSE

Brett Rickman, as an Assistant Project Manager, will lead the fraud, waste, and abuse function. Mr. Rickman is a seasoned lawyer with more than 20 years of experience providing legal counsel in both waste fraud and abuse and contracting. He is experienced in commercial and regulatory law relating to contracts and Federal procurement, corporate compliance, environmental law, litigation (Federal, state, and administrative) and privacy. *Mr. Rickman's long history in*





*overseeing programs for fraud, waste, and abuse will keep our team appropriately vigilant to avoid any intentional or unintentional abuse.*

## ADDITIONAL KEY STAFF

Our staffing plan assures that there are sufficient resources available to scale up immediately when needed in all areas significant to the DEP program. In addition to our core management team, our staffing plan also includes team leads and a cadre of subject-matter experts.

Further bolstering our team are six local New Jersey subcontractors with decades of local experience and current working relationships with the State of New Jersey. Our subcontracting partners bring specialized expertise to support program elements that will complement existing support to DEP and assist in the management of EAF Contractors. Staff augmentation support for Section 106 compliance that meets the Secretary of Interior's Standards is provided by ICF's cultural resources and archeological staff, managed by Rick Starzak. In addition:

- Cultural Preservation and Restoration (CPR), a small business with offices in New Jersey, will augment program support to Section 106 reviews.
- The distinguished firm of WarrenPro/Paulus Sokolowski & Sartor (PS&S Global, LLC) will provide fraud, waste, and abuse monitoring and supporting expertise to the entire

program.

- Additional staff augmentation support will be provided by Matrix New World (environmental services support).
- CCN Resources has partnered with ICF to provide administrative services support staffing from a pool of staff located in New Jersey.
- AKRF, Inc. and Vanasse Hangen Brustlin, Inc. (VHB) will also provide additional environmental services, subject matter experts, and program support.

Exhibit 1-2 briefly describes subcontractors for this RFO. Additional detailed information on these firms may be found in Tab 9.

## ORGANIZATIONAL STRUCTURE

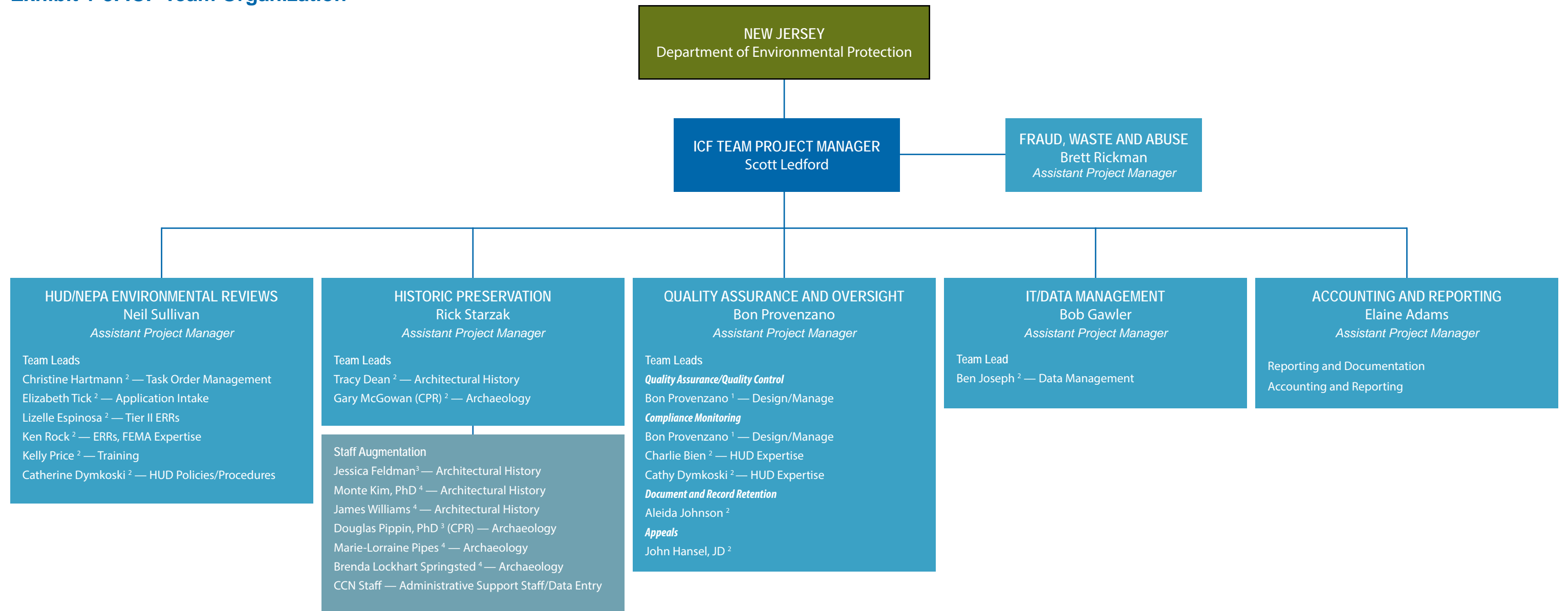
ICF proposes an organizational structure for the program that clearly aligns responsibility and authority for key tasks. The key tasks will be supported by an integrated information technology structure accessible to all task leads and a pool of subject-matter experts. As we work through the startup, we will partner with DEP staff to refine processes and procedures. Exhibit 1-3 shows the anticipated organizational chart for the ICF core management team and the related supporting team members. The management team will be immediately available and deployed to DEP upon contract execution in April.

**EXHIBIT 1-2: ICF'S SUBCONTRACTING PARTNERS**

Subcontractor	Business Category	Project Support
<b>New Jersey Certified Small Business Subcontractors</b>		
<b>Cultural Preservation and Restoration (CPR)</b> —NJ small business specializing in the treatment and conservation of archaeological materials	New Jersey Category I and Category IV Small Business	Archaeology and cultural history
<b>WarrenPro/PS&amp;S Global, LLC</b> —NJ certified small business enterprise (SBE) that specializes in waste, fraud, and abuse of contractors in response to DR programs	New Jersey Category II and Category IV Small Business	Waste, fraud, abuse monitoring and reporting
<b>Matrix New World</b> —NJ woman-owned full-service engineering and environmental services firm	New Jersey Category III Small Business	Environmental services, staff augmentation for office support
<b>CCN Resources</b> —20 years providing direct hire and temp staff in NJ	New Jersey Category III Small Business	Staff for additional administrative personnel
<b>New Jersey Large Business Subcontractors</b>		
<b>AKRF, Inc.</b> —32 years of providing NEPA and a full range of environmental, planning, and engineering services	Large Business	CDBG, environmental services, task order managers, program support
<b>Vanasse Hangen Brustlin, Inc. (VHB)</b> —34 years of providing NEPA and a full range of environmental, planning, and engineering services	Large Business	Environmental services, task order managers, program support



## Exhibit 1-3. ICF Team Organization



### SUBJECT MATTER EXPERTS

- HUD/CDBG — Dolores Acurso <sup>2</sup>
- FEMA — Tracy Dean <sup>2</sup>
- Archaeology — Carol Weed <sup>2</sup> (VHB)
- Architectural History — Colleen Davis <sup>2</sup>
- Floodplains — Alexa La Plante <sup>2</sup>
- Wetlands and Water Resources — Brian Hobbs <sup>2</sup> (Matrix New World)
- Coastal Zone Management — Neville Reynolds <sup>2</sup> (VHB)
- Sole Source Aquifers — Brian Zieroff <sup>2</sup> (AKRF) Biology/T&E Species — Dave Johnson <sup>2</sup>
- Wild & Scenic Rivers — Shandor Szalay <sup>2</sup> (AKRF)
- Air Quality — Tom Wholley <sup>2</sup> (VHB)
- Farmland Protection Policy Act — Gary Rickle <sup>2</sup> (AKRF)
- Environmental Justice — Shilpa Trisal <sup>2</sup>
- Noise Abatement & Control — David Coate <sup>2</sup>
- Toxic Chemicals/Hazardous Materials/Contaminated Sites — Jim Rice <sup>2</sup>
- Phase I & II ESA Lead Reviewer — Thomas DeMichele, LSRP <sup>2</sup> (Matrix New World)
- Hazardous Operations/Above Ground Storage Tanks — Robert Lanza <sup>2</sup>
- Airports — Peter Byrne <sup>2</sup> (VHB)
- Land Use/Planning — Graham Trelstad <sup>2</sup> (AKRF)
- Socioeconomics — Alex Uriarte <sup>2</sup>
- Transportation — Tom Phelan <sup>2</sup> (traffic), Lisa DiTaranti <sup>2</sup> (transit) (VHB)
- GIS — Dan Moreno <sup>2</sup>
- Community Outreach — Susan O'Donnell <sup>2</sup> (VHB)

#### Labor Titles

- <sup>1</sup> Assistant Project Manager
- <sup>2</sup> Program Development Specialist
- <sup>3</sup> Historic Preservation Specialist 1
- <sup>4</sup> Historic Preservation Specialist 2



### 1.2.3 Operations (3.1.1.2)

Given DEP's successful track record of processing thousands of environmental reviews over the past seven months, ICF's emphasis from startup through operations will be on continuity. ICF will operate the existing program while continuously evaluating possible refinements and making recommendations, as appropriate, to the State Contract Manager. We will provide immediate program oversight support to DEP while maintaining DEP's vision for managing this complex program. Our overall goal is to ensure that well-reasoned, quick decisions are made, allowing funding to flow to recipients to expedite rebuilding efforts. The following is an overview of our operations plan.

#### IMPLEMENTING AN EFFECTIVE ENVIRONMENTAL REVIEW PROCESS

Environmental reviews are in the critical path between a property owner's application for assistance and release of funds. Completing environmental reviews quickly, effectively, and compliantly is key to program success. Based on our understanding of the objectives, we recognize that DEP is looking for a team that is fully capable of:

- Overseeing, reviewing, and providing guidance and legal sufficiency analysis for environmental reviews that meet the requirements of all applicable laws and regulations for environmental review procedures relating to HUD CDBG-DR activities, FEMA Hazard Mitigation Grant Program (HMGP), and other state, local, and Federal agencies.
- Providing rapid response and deployment of program staff to DEP to provide immediate and effective HUD CDBG-DR program support.
- Evaluating and streamlining existing protocols and policies and updating practices to withstand scrutiny from outside agency or stakeholder inquiries.
- Orchestrating program updates efficiently and seamlessly at DEP and among the EAF Contractors.
- Designing a quality assurance program that considers all evaluations completed to date and implementing an updated quality management system where necessary.
- Evaluating and implementing IT systems that are compatible with existing and recommended program systems.

To meet all of these needs and objectives, ICF's effective environmental review process:

- Rapidly mobilizes experienced ICF Team staff and recruits additional support, as needed.
- Fosters a productive and collaborative effort with DEP and other agency staff.
- Applies our extensive knowledge of the action plan's programs, CDBG-DR regulations, and associated compliance requirements.
- Utilizes team experience and existing tools to streamline processes.
- Integrates the IT system with other data record storage systems and databases, including coordinating with ERMS and interface with Sandy Integrated Reporting Operations Management System (SIROMS).
- Applies knowledge to quickly acclimate to existing protocols, provide efficient and effective updates, and assist DEP in reviewing submitted ERRs.

#### EVALUATING THE EXISTING PROGRAM

As Program Manager, the ICF Team will quickly deploy to DEP following award in April and will meet, coordinate, and collaborate with pertinent staff onsite. After a brief acclimation to the existing program and receipt of all access approvals to electronic systems, ICF's core team will review existing environmental review processes and procedures, provide input and recommended streamlined processes, oversee EAF Contractors, review their environmental compliance documentation, and monitor their performance. In addition, the ICF core team will integrate the latest updates to the action plan (if available), and address additional review needs or support requirements based on the anticipated influx of new applications.

Based on past experience with HUD CDBG-DR programs and a deep understanding of Section 106 requirements, ICF's core team will provide suggested program updates and apply lessons learned that assist in developing streamlined protocols. Any updates or modifications to the existing program will be presented to DEP for review. Upon approval, we will outline updated protocols and procedures in a program management plan. Implementation of the program plan will include training protocols necessary to disseminate program changes or modifications to EAF Contractors.

#### IMPLEMENTING OVERALL ENVIRONMENTAL AND HISTORIC PRESERVATION REVIEW PROGRAM

ICF's experience and expertise will assure that: environmental reviews are conducted in compliance with 24 CFR Part 58; 24



CFR Part 55; FEMA 44 CFR Part 10; 36 CFR Part 800, Section 106 under the National Historic Preservation Act; as well as applicable laws and regulations including NEPA environmental review procedures relating to HUD CDBG-DR activities, FEMA HMGP, and other applicable local, state, and Federal environmental laws. Our deep knowledge in HUD, FEMA, Section 106, and related environmental regulations provides the following insight:

- Preparation and review of ERRs is a key element that supports the environmental clearance so that HUD funds can be released for the funding commitment from DCA or its sub-recipients. Swift, effective, concise, and defensible reviews are essential to the success of the program.
- The various recovery programs include a variety of levels of environmental review support, with the RREM as the most active and successful environmental review completions. Tier I and Tier II reviews are well underway for all programs. With a deep understanding of the HUD requirements under CDBG-DR-funded programs, our core team is prepared to provide a thorough assessment of existing protocols and environmental review processes to enhance productivity and progress within the program. Our subject-matter experts are ready to assist in each level of environmental review and shepherd each recovery program through the process from EAF review to funding allocation.

## PROVIDING ADDITIONAL COMPLIANCE

ICF is fully versed in 24 CFR Part 58 and understands the **construct of HUD's tiered environmental review process**. With the variety of action plan programs designed to expedite recovery, ICF is ready to provide additional compliance support to DEP on more complex projects (e.g., projects requiring EAs and projects with unexpected impacts such as hazardous spills or contamination). **In addition, ICF's CDBG-DR program experience ensures thorough, concise, and expedited reviews that will withstand HUD audits and other Federal agency scrutiny. ICF's long-standing support to HUD and FEMA on environmental compliance reviews for recovery programs provides immediate application of lessons learned and offers potential streamlining opportunities that are fully compliant but expedite environmental reviews to speed the recovery effort.**

## APPROACH AND LEVEL OF EFFORT

The ICF Team's approach to core program management operations consists of eight essential management functions, as follows:

- a. Facilitate discussions on business flow process, database development, and financial management system. While efficient operation of the environmental review process is essential, financial management is equally important. DEP coordinates closely with DCA, New Jersey Environmental Infrastructure Trust (NJEIT), and its sub-recipients to administer Superstorm Sandy disaster recovery programs. Involving multiple agencies **and diverse stakeholders, New Jersey's Sandy recovery effort** operates at such a scale and complexity that it requires an ongoing process of open communication and continual adjustment to evolving circumstances, such as new programs or additional funding. Depending on the topic under discussion (e.g., data coordination, CDBG financial management, business flow), Scott Ledford will assign the appropriate staff to assist DEP. **At DEP's direction, ICF staff will facilitate discussions with those agencies to achieve coordinated business processes for documenting environmental reviews and handling financial accounting associated with those reviews.** For example, to the extent that applications arriving at DEP for environmental review from different agencies or sub-recipients are not presented in a consistent fashion, ICF could facilitate a discussion of the challenges involved and guide a solution that meets the needs of all. Additionally, *ICF has experts in CDBG-DR grant program financial reporting and can facilitate **communication around HUD's financial reporting requirements to meet program needs in the most efficient manner possible.***
- b. Determine required levels of environmental reviews for future projects. On January 29, 2014, DCA published a draft of its amended action plan. Adding another \$1.5 billion in funding, the amended action plan adds new **programs to New Jersey's recovery effort including Infrastructure Programs, Support for Local Government, and the Blue Acres Buyout Program.** ICF will consult with DEP regarding the nature of potential environmental impacts posed by these programs and recommend **appropriate levels of review based on HUD's regulations.** Neil Sullivan served in this role for the programs included in the original action plan. In making recommendations, Mr. Sullivan, supported by his team of NEPA and HUD experts, will help evaluate the intensity of potential impacts from future programs. **Mr. Sullivan's familiarity with the existing programs, knowledge of potential impacts associated with existing programs, and decades of HUD experience will allow him to make quick, decisive,**



- and defensible recommendations regarding the new programs.
- c. Perform quality assurance on applications received from DCA sub-recipients. Adequate data and documentation are the foundation of a compliant environmental review. For some programs, applications are received via the State Document Library, while for others, applications are received via email. In all cases, the application data and supporting documentation must be complete before the environmental review is tasked out to an EAF Contractor. During start-up, the ICF Team will become fully conversant with the application quality assurance protocol established by DEP. Using **DEP's established protocol, Bon Provenzano will work with Neil Sullivan's team** to ensure that applications are complete and ready for task out. In cases where the application is incomplete, ICF will coordinate with the appropriate agency (e.g., DCA, sub-recipient) to obtain the missing information. ICF may recommend refinements to the application quality assurance program. ICF is currently supporting the State of **Connecticut's HUD CDBG-DR funded Superstorm Sandy recovery with a comprehensive application management program. *ICF's experience in Connecticut, coupled with the environmental review experience of its staff, will result in a clear understanding of the application processes and how they affect receipt of information required for the environmental review.***
  - d. Recommend process improvements to EAF Contractors. Before recommending improvements, ICF **will evaluate the EAF Contractor's processes, focusing on areas for increased efficiency.** Neil Sullivan will take the lead on this task, working with his environmental review experts. This review will begin quickly with the EAF Contractor meeting held during startup, which will allow us to familiarize ourselves with the EAF Contractors and their staff. The review ICF conducts of the environmental clearance work performed to date will also inform this evaluation. Following the initial EAF Contractor meeting **and review of each EAF Contractor's environmental work,** ICF will conduct targeted interviews with EAF Contractor staff to complete our understanding of each EAF **Contractor's processes.** Based upon that review, we will develop recommendations related to EAF Contractor processes aimed at improving performance in the areas of timely delivery, compliant documentation, efficiency of operations, and overall quality/accuracy/consistency of deliverables. In addition, this review will ensure we make appropriate preparations for an audit and review of the program by HUD and other regulatory entities. Some recommendations may involve additional training for some or all EAF Contractors. *Evaluating EAF Contractor processes is an effective risk management tool.*
  - e. Implement efficiencies recommended during review of EAF Contractor processes, as approved. Upon the **State Contract Manager's approval of one or more of ICF's recommendations regarding EAF Contractors' processes,** ICF will implement the recommendations. Taking a cooperative and collaborative approach to working with the EAF Contractors, Mr. Ledford and his team will formulate a plan for improvement, identifying concrete steps, measurable goals, and expected timeframes. *Improving the quality and efficiency of EAF Contractor work will result in faster approvals of program applications.*
  - f. Participate in interagency meetings. Given the many sources of recovery funding, and the involvement of multiple state and Federal agencies in funding, permitting, review, and regulatory functions, the ICF Team believes that collaboration and communication are essential to a successful disaster recovery effort in New Jersey. To this end, we will participate in interagency meetings at the request of the State Contract Manager. In addition, we will suggest meetings for the State **Contract Manager's consideration when we identify specific topics that we think would benefit from inter-agency discussion.** Scott Ledford will coordinate with DEP to select which ICF staff will be assigned to participate in specific meetings based on the topics under discussion. Whether conducted in person or via teleconference, these meetings will serve to align knowledge and understanding among agencies regarding the current status of disaster recovery program and projected future volume.  
  
ICF partners with and facilitates communication among a diverse set of stakeholders on every project, holding meetings to ensure that agencies are informed about project status and have the opportunity to share concerns. Interagency meetings provide a forum to agree on environmental review management protocols and processes. Most importantly, they maintain open lines of communication, which will foster productive working relationships among the stakeholders.
  - g. Track task orders against invoices. DEP has engaged six EAF Contractors to perform environmental reviews in support of disaster recovery programs. Before



recommending payment of EAF Contractor invoices, DEP must verify that those invoices are a true and accurate representation of the task orders issued to the EAF Contractor and that the work performed is complete and satisfactory. Using a baseline of data regarding task orders and environmental review status stored in the ERMS system, ICF will use its IT system to track and manage invoice approvals. A collaborative effort **incorporating staff and tools from Neil Sullivan's environmental review team, Bob Gawler's IT team, and Elaine Adams' accounting staff**, ICF will track environmental review invoice data by application number, address, program, EAF Contractor, type of assignment, and task order. **ICF's IT system will generate standard invoice approval reports/notifications and provide for customized reporting to DEP and DCA on an as-needed basis. ICF's IT System will track costs**

*associated with environmental review by application number, allowing DCA/DEP to associate the environmental review with a specific address/project and charge them as project delivery costs.*

- h. Create projected budget and cash flow for a two-year period. In order to help DCA and DEP control administrative and program delivery costs, ICF staff, led by **Elaine Adams'** team, will assist DEP by creating a budget and cash flow projection covering a two-year period. This will enable DEP to plan its internal staffing, capital expenditures, and schedule grant funding distribution requests. The budget is anticipated to be a living document, which we will adjust as more information regarding the actual volume of the different type of reviews and the final number of homeowners to be served becomes available. Our approach to developing this time-phased budget/cash flow projection will include consideration of the following:
- Time frames outlined by the EAF Contractors in their bid quotes
  - Volume of assessments to be conducted for each program
  - Environmental work completed to date to ensure completeness and accuracy
  - Priorities of DEP, other agencies and the **governor's staff**;
  - Capacity of EAF Contractors

These criteria will help establish the volume of assessments over time and, along with the cost of the assessments, will enable a time phased budget/cash flow analysis. ICF will work

with DEP to update the time-phased budget as the program is executed to allow for changing priorities.

#### LEVEL OF EFFORT

While core program management operations described in Section 3.1.1.2 of the RFQ would begin at contract execution, the duration would continue throughout the three-year contract to support up to 15,000 environmental reviews associated with the programs in the first Action Plan and up to 6,000 reviews in the draft Action Plan Amendment Number 7 (Substantial Amendment for the Second Allocation of CDBG-DR Funds) that is currently out for public comment.. This work includes having the core management staff and teams available to provide program management. The cost for this activity is included in Line Item 2 of the Cost Quotation Price Schedule 1.

#### 1.2.4. Core Program Management Start-Up (3.1.1.3)

DEP has identified priority tasks for the Program Management Contractor that must be accomplished within the first 15 days of contract execution. The ICF Team's approach to startup has proven to be successful on prior disaster recovery support efforts, and we are confident that our experience will benefit DEP. While prioritizing the identified startup tasks during the first 15 days, the ICF Team will simultaneously mobilize our resources to begin work on the core operations tasks. In some cases, a startup task is linked directly to operations task. (See Exhibit 1-4 for our proposed program schedule for startup activities.) In those cases, ICF will prioritize staff assignments to maintain continuity from recommendations made during the startup phase through any implementation authorized during the operations phase.

During startup, our project manager, Scott Ledford, will convene daily "stand-up" meetings of approximately ½ hour to ensure that startup and operations tasks are well coordinated and proceeding according to schedule. ICF intends to partner with the DEP team throughout the process to help expand the support that DEP is already providing. *Our #1 goal is to quickly get up to speed on DEP's operational processes, assume management as expeditiously as seems prudent, and recommend carefully considered improvements.*

#### APPROACH AND LEVEL OF EFFORT

ICF's approach to accomplishing DEP's six priority startup tasks includes the following steps.





- a. Evaluate the existing task order procedure and recommend improvements. Although DEP has been successfully supporting DCA's disaster recovery programs with an effective environmental and historic preservation review process for the past seven months, DEP is committed to continuous evaluation and improvement of its procedure for issuing task order to EAF Contractors. DEP will soon bring ERMS online and among its capabilities is task order assignment. Under **Neil Sullivan's** direction, ICF staff collaborate with DEP's task order management staff to assess the existing assignment procedure, assess its effectiveness,

incorporate ERMS capabilities, and recommend modifications as needed.

Based on our knowledge of the environmental review process, meetings with DEP, interagency meetings, initial startup meeting with EAF Contractors, and environmental reviews conducted to date, the ICF Team will analyze the entire scope of potential environmental and historic preservation review procedures and verify that the compliance elements are addressed by the task order form. Compliance will include applicable HUD, FEMA, and other applicable laws and regulations related to Section 106 (in particular the Programmatic

**EXHIBIT 1-4. 15-DAY STARTUP PROGRAM SCHEDULE**

Program Start-up Activities	Week 1							Week 2							Wk 3	
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	
<b>(a) Task Order Procedures</b>	[Green bar]															
<i>Familiarize Team on Existing Task Order Procedures</i>	[Blue bar]															
<i>Evaluate Procedures</i>	[Blue bar]															
<i>Recommend Efficiency Improvements</i>								[Blue bar]								
<b>(b) Trenton Area Office</b>	[Green bar]															
<i>Establish Office</i>	[Blue bar]												[Green dot]			
<i>Begin Work in Office</i>														[Blue bar]		[Green dot]
<b>(c) Program Management Services</b>	[Green bar]															
<i>Familiarize Team on Prior Management Practices, Procedures, Programs</i>	[Blue bar]															
<i>Manage Environmental Review and Historic Preservation Program</i>														[Blue bar]		[Green dot]
<b>(d) EAF Contractor Meetings</b>	[Green bar]															
<i>Schedule EAF Contractor Meeting</i>					[Green dot]											
<i>Familiarize Team on EAF Contractors and Reviews Completed</i>	[Blue bar]															
<i>Conduct EAF Contractor Meeting</i>														[Green dot]		
<b>(e) Environmental Review Completed To Date</b>	[Green bar]															
<i>Review Completed ERRs</i>			[Blue bar]													
<i>Assess Completed ERRs for Completeness and Accuracy</i>					[Blue bar]											[Green dot]
<b>(f) DEP Standardized Forms/Processes</b>	[Green bar]															
<i>Evaluate Standardized Forms</i>	[Blue bar]															
<i>Recommend Revisions to Forms</i>						[Blue bar]										[Green dot]
<i>Evaluate Operational Processes</i>	[Blue bar]															
<i>Recommend New/Amended Processes</i>					[Blue bar]											[Green dot]



- Agreement), toxic chemicals, floodplain management, noise, airport hazards, wetlands, and coastal zone management in addition to other environmental factors like soils/erosion, water supply and sewers, unique natural features, schools, and emergency services. We will recommend revised review protocols and procedures to DEP for approval, and develop or update the task order form for the State Contract Manager accordingly.
- b. Establish an office in Trenton and begin work. ICF is committed to providing DEP with the in-person support needed to successfully implement this program. In the hopes that we will be awarded this contract, ICF has already initiated the process of locating office space in Trenton and is considering entering into an agreement to occupy space at *850 Bear Tavern Road in Ewing, approximately five minutes from DEP's office*. With this advance work underway and overseen directly by Scott Ledford, we are confident of meeting the stated need for our office space to be functioning within 15 days of contract signing. In the interim, ICF plans to work onsite at DEP (as requested), at temporary office space located within the offices of subcontractors in New Jersey, and/or from local hotel space.
- c. Assume program management services. Within days of contract execution, ICF's program management team, including its NEPA/environmental lead, Neil Sullivan, and historic preservation lead, Rick Starzak, will embed with DEP's current management staff to familiarize themselves with DEP's current operational and management processes. Once up to speed with the management process, the ICF Team, led by Scott Ledford, will assume management of the entire program under the supervision and in close communication with the State Contract Manager. *Based on the program knowledge of our management team who are already supporting New Jersey's recovery effort, ICF can quickly assume management of the program within 15 days.*
- d. Conduct a meeting of the EAF Contractors. As the Program Manager, the ICF Team must develop a productive working relationship with the six EAF Contractors DEP has engaged to perform environmental and historic preservation reviews. Members of ICF's management team, including Scott Ledford, Neil Sullivan, and Rick Starzak, will conduct a meeting of the EAF Contractors within 15 calendar days of contract execution. This meeting will allow the ICF Team to meet the management teams assigned by the EAF Contractors
- face to face, introduce the ICF Team, explain our management strategy, listen to their concerns, and develop professional rapport. A priority discussion item at the EAF Contractor meeting will be soliciting suggestions for improvements to the task order assignment system.
- e. Assess completed environmental clearance reviews. Compliance with funding requirements depends on several criteria, including appropriately completed environmental reviews. While it is essential to maintain the quality of each individual environmental review record, it is equally important to ensure that environmental review records across the program are completed in a consistent fashion regardless of the action plan program, level of review, or EAF Contractor completing the environmental review. Quality and consistency will ensure that HUD and other regulatory audits yield satisfactory results. To ensure end-to-end quality and consistency cutting across funding sources, reviewers, and programs, the ICF Team will review the environmental compliance work conducted to date by EAF Contractors and DEP staff, FEMA, or any other staff. Based upon that review, ICF will make recommendations, if indicated, for corrective action to bring the environmental clearance reviews into full compliance. This review will be led by NEPA expert Neil Sullivan who **will use ICF's decades of HUD experience to ensure that** documents that have already been prepared are in compliance with HUD's regulations at 24 CFR Part 58. In this effort, Mr. Sullivan will be supported by members of his team with HUD NEPA and HUD policies and procedures experience, including Charlie Bien and Cathy Dymkoski. If the reviews identify gaps in compliance, ICF will make recommendations to fill the gaps to ensure funding compliance.

ICF will step in on the first day and begin assessing the more than 2,600 environmental documents already completed without having to recuse ourselves and eliminating the potential added burden to DEP presented by others with a conflict of interest. Neil Sullivan and his team are familiar with the documentation being prepared having helped DEP develop the HUD compliance strategy for this program.





- f. Evaluate standardized forms and processes. During the first seven months of program operation, DEP has developed forms and processes for conducting environmental reviews and interaction among DEP, DCA, EAF Contractors, sub-recipients, and their contractors. During startup, Neil Sullivan will mobilize his NEPA and HUD experts, and Bob Gawler will bring his IT team to work closely with DEP staff to learn the system DEP has developed and quickly familiarize the team with ERMS and its capabilities. Based upon this review and orientation, ICF will make recommendations, if any, to revise forms and/or update processes based upon DEP's needs and priorities.

#### LEVEL OF EFFORT

The ICF Team will meet the requirements of startup as listed in items a through f in Section 3.1.1.3 of the RFQ and discussed above. The cost for this activity is included in Line Item 1 of the Cost Quotation Price Schedule 1.

### 1.3 Use of Existing IT System (3.1.2)

Having run large housing recovery and grant management projects, the ICF Team understands the importance of IT

systems to ensure efficient work processes, enable team collaboration, capture accurate and defensible data, and integrate with other critical program systems. The vital nature of this program dictates that ICF rapidly gain expertise in the **program's current IT environment and efficiently introduce** our system into the program architecture. We will provide the IT system to meet critical needs from the start, while remaining flexible enough to allow for improvements and integration within the greater IT environment.

#### APPROACH AND LEVEL OF EFFORT

ICF will use Microsoft's Office365 Enterprise E3 cloud solution to meet the program needs understood today and provide flexibility as the program continues, as shown in Exhibit 1-5. Office365 is a cloud-solution that integrates many of **Microsoft's desktop and server applications into a cohesive, flexible hosting platform.** With no custom development, it provides Web-based versions of the standard Office applications (Word, Excel, PowerPoint), enhancing collaboration and sharing. It also provides powerful server applications to enable data collection, workflow, and Web site development.

This ICF IT system will be part of a growing and dynamic IT landscape supporting the CDBG-DR program. ICF will begin

#### EXHIBIT 1-5. OFFICE365 MEETS PROGRAM NEEDS WITH LITTLE ADDITIONAL CONFIGURATION

Architecture	Data Collection	Document Management and Workflow
<ul style="list-style-type: none"> <li>▪ Cloud-based, Web solution to avoid server installation costs and time</li> <li>▪ Numerous App and Web Parts plug-ins available</li> <li>▪ Ability to integrate custom development</li> <li>▪ Scalable for increases in users, processing, and data</li> <li>▪ Mobile support for possible field data collection needs</li> </ul>	<ul style="list-style-type: none"> <li>▪ Ability to create custom lists and modules for:               <ul style="list-style-type: none"> <li>– Budget projection data</li> <li>– Purchase orders and EAF invoicing</li> <li>– Assessment management</li> <li>– EAF documentation</li> <li>– Compliance monitoring</li> <li>– Appeals data</li> <li>– Fraud, waste, and abuse data</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>▪ Full document and records management support</li> <li>▪ Budget and invoicing, assessment, contractor, and compliance workflows</li> <li>▪ Complete full-text search</li> <li>▪ Simple and complex form, data, and document workflow to implement the desired environmental review process</li> <li>▪ Automated email notifications</li> </ul>
Security	Reporting	Integration
<ul style="list-style-type: none"> <li>▪ Full user identification and authentication</li> <li>▪ Support for security groups and detailed security roles</li> <li>▪ Compliant with world-class industry standards, including ISO 27001, EU Model clauses, HIPAA BAA, and FISMA</li> </ul>	<ul style="list-style-type: none"> <li>▪ Full reporting capabilities with the option of integrating with Azure's reporting services</li> <li>▪ Create dashboards with associated reports for data and workflow items</li> </ul>	<ul style="list-style-type: none"> <li>▪ Robust API architecture</li> <li>▪ Support for data import and export from databases, spreadsheets, and XML through APIs</li> <li>▪ Flexible to make compatible with future systems, including DCA contractor's housing programs MIS system</li> <li>▪ Support daily uploads of data</li> </ul>



working with ERMS on day one of the project, capturing the data that must be accessible to present and future project stakeholders. Using the schema of the XML imports and exports, we will develop a process to smoothly interface with them in Office 365. ICF understands the level of data detail capture required to ensure efficient program flow as well as satisfy audits and reviews and will participate in meetings with DEP and NJEIT to ensure we capture the proper scope and depth of data in ERMS.

In addition, upon startup, we will commence augmenting our **system to work with ERMS. ICF's system can also be used to transfer data to and from the program data warehouse.**

#### LEVEL OF EFFORT

The ICF Team will utilize Microsoft Office 365 (125 licenses) and Tableau (five licenses) and create XML interface with ERMS to meet the requirements in Section 3.1.2 of the RFQ. The cost for this activity is included in Line Item 2 of the Cost Quotation Price Schedule 1.

### 1.4 Use of Contractor's Existing IT System (3.1.3)

Exhibit 1-5 provides evidence that Office 365, ICF's existing IT system, meets many program needs with little additional configuration and can be further configured for the **program's specific environmental review workflow**. This flexibility illustrates the strength of the solution and the ability to use existing App/Web Part plugins along with third-party solutions to track EAF task orders (i.e., Task Order Tracker), communicate key project milestones, import applications for review, and store/display attachments like photos.

#### APPROACH AND LEVEL OF EFFORT

ICF plans to implement an approach proven on our other large recovery and grant projects but tailored specifically for NJ and our Office365 solution. Having established IT systems to support numerous, multi-billion dollar recovery programs, we have experience on how to manage our solution to overcome typical challenges.

The approach focuses on fast, efficient configuration of the out-of-the-box solution in small, structured stages to meet the program needs immediately and respond to changes. It also provides a platform to adapt to future needs (reporting, integrating with systems under development). Our approach is described in Exhibit 1-6.

Pre-configuring our solution to the extent possible will allow the program to benefit from day one of installation. ICF will then work to maximize the system functionality and fill in current IT gaps.

#### LEVEL OF EFFORT

As part of utilizing an established IT system to satisfy the requirements in Section 3.1.3 of the RFQ, the ICF Team will implement Microsoft Office 365, set up users and roles, set up critical initial lists and basic workflow procedures, and further configure Microsoft Office 365 for prioritized data collection, workflow, and reporting. ICF will update the system to support additional tasks and data elements (included on the grant application or in ERMS) to support performance monitoring and reporting. The cost for this activity is included in Line Item 2 of the Cost Quotation Price Schedule 1.

#### EXHIBIT 1-6. ICF ESTABLISHES IT SYSTEMS IN SMALL, STRUCTURED STAGES AND HELPS OUR TEAMS REACT QUICKLY IN A FAST-CHANGING ENVIRONMENT

##### Pre-Award: Provision Office365 Infrastructure

- Order and enable the Office365 environment. Add App Parts for team collaboration to cover security, document management, records management, checklists, status tracking, attachments, and content websites
- Work with team subject matter experts to create draft security groups and roles
- Work with team subject matter experts to map out basic data elements and workflow

##### Upon Award: Establish IT System

- Deploy system to meet initial user needs
- Create lists and documents to augment ERMS capabilities
- Implement most critical workflow procedures (managing budgets, purchase orders, Invoices, etc.)
- Train key system users as needed

##### Post Award: Customize System

- Meet with NJ to determine additional customization
- Augment initial user needs with additional customization
- Work with NJ to prioritize needs with a focus on initial backlog management, data collection, document management, and basic workflow
- Generate export format to transfer data from Office365 to ERMS
- Configure Office365 and appropriate App/Web Parts to handle the desired data collection, workflow, and reporting



## 1.5 Environmental Reviews (3.1.4)

This section describes ICF's approach and the level of effort to accomplish the requirements of RFQ Section 3.1.4 Core Program Management Operations - Environmental Reviews. Specifically, the Program Manager is responsible for implementing and overseeing the entire review process, from determining the level of review needed and issuing task orders to EAF Contractors, to managing the compliance and quality of the reviews, and reporting to DEP. In carrying out this function, our goal is to utilize the process developed by DEP, refine that process if needed, and implement a program that allows applications to move quickly through the environmental review process in a compliant and fully traceable manner.

Effective program management requires sound and proven procedures, and managers and staff capable of executing effectively and efficiently. The ICF staff members proposed to implement the environmental review management program brings deep domain knowledge in HUD and NEPA reviews as well as experience in program management.

The HUD/NEPA Environmental Reviews Team will be led by Neil Sullivan. Mr. Sullivan will manage the overall environmental review process. He will be supported by several experienced managers senior advisors with decades of HUD experience, and a team of subject matter experts and junior support staff.

Mr. Sullivan has been providing advice and guidance on compliance with HUD's environmental regulation to DCA and DEP since February 2013 and is fully up to speed on the program requirements. He can ensure a fast startup of the environmental review program as he has experience managing similar types of environmental review efforts. For example, he managed a large team of ICF staff providing NEPA support to **the U.S. Department of Energy's (DOE's)** Office of Energy Efficiency and Renewable Energy for grant-funded projects under the American Recovery and Reinvestment Act (ARRA). Under **Mr. Sullivan's** leadership, ICF assisted in making NEPA determinations for thousands of projects as part of DOE's \$3.6 billion in ARRA funding. This high-profile project operated under intense scrutiny from the Vice President's office, and ICF was instrumental in helping DOE perform NEPA reviews quickly to allow grant funds to be disbursed. *Lessons learned during this engagement on the importance of planning, staffing, defining roles and responsibilities, and reporting progress will be crucial to success of the CDBG-DR program.* In addition, Mr. Sullivan managed ICF's environmental support to the MSHDA for NSP2 funded projects. He helped ensure compliance with

HUD's regulations, delivered training to 12 communities receiving NSP2 funds, and managed the preparation of a Tiered Environmental Assessment process that covered thousands of properties across Michigan. ICF's support to MSHDA helped accelerate the program to meet a mandated funding deadline and ensure grant funds were spent on time.

Major components of the environmental review process will be managed by the following staff:

**Task Order Preparation and EAF Contractor Management:** Christine Hartmann. Ms. Hartmann will manage the review of applications, task order preparation, and overall EAF Contractor management. Ms. Hartmann, a senior manager and PMP, was a key member of the project team supporting DOE and can apply the lessons of that engagement to ensuring the success of the CDBG-DR program. She also supported the review of environmental assessments prepared in accordance with 24 CFR Part 58 by developers for the MSHDA project. Ms. Hartmann also managed a task with HUD Headquarters to review its guidebook on *Siting of HUD-Assisted Projects near Hazardous Facilities* and to recommend improvements. She also has experience overseeing contractors for multiple water treatment plant and wastewater treatment plant design, construction and start-up projects. *Ms. Hartmann has the management and organizational skills to run the front end of the environmental review process, where applications are reviewed, NEPA determinations made, and task orders issued to EAF Contractors.*

**Environmental Document Reviews (Tier 2s):** Lizelle Espinosa. Ms. Espinosa will manage the review of Tier 2 checklists prepared for the RREM and Small Rental programs. She was another key member of the DOE project team who spent more than a year working onsite at DOE Headquarters processing environmental reviews and providing guidance to DOE on the ARRA project. In addition, she has provided NEPA document review and preparation support to various DOE offices including the Office of NEPA Policy and Compliance. She is also an Environmental Management Systems auditor. *Ms. Espinosa's management will help to ensure all Tier 2 checklists are in compliance with NEPA.*

**Environmental Document Reviews (EAs and Special Studies):** Ken Rock. Mr. Rock will manage the review of EAs and special studies prepared across the action plan programs. He will be supported by a team of senior HUD advisers and subject matter experts. Mr. Rock's experience includes emergency management, environmental assessment, strategic planning, and training. His public-sector experience includes diverse projects for FEMA, the U.S.



Environmental Protection Agency, and the U.S. Department of Defense. He has supported FEMA on disasters in Florida and North Carolina and served as FEMA's lead environmental contractor for public assistance programs in coastal North Carolina counties affected by Hurricane Floyd. *Mr. Rock's on-the-ground and policy-level understanding of FEMA's processes provides additional lessons learned for DEP's benefit.*

Section 106 Consultation/Compliance: Richard Starzak. *Richard Starzak and his team meet the Secretary of the Interior's Historic Preservation Professional Qualification Standard.* This team will assist DEP in consultation with DCA, its sub-recipients, and SHPO to develop appropriately compliant but streamlined approaches to Section 106 and PA implementation. This process will expedite approvals by quickly approving straightforward applications.

Richard Starzak holds an MA in Architecture with more than 33 years of experience, specializing in Section 106 compliance and historic resources surveys. Gary McGowan is president of Cultural Preservation and Restoration (CPR), with more than 25 years of experience in a range of archaeological materials, including those impacted by Superstorm Sandy. Tracy Dean, who holds an MHP in Historic Preservation, has 20 years of experience with a strong background in Federal regulatory compliance for Section 106.

Senior HUD Policy Advisors: Charlie Bien and Cathy Dymkoski. Former HUD officers Charlie Bien and Cathy Dymkoski will act as Senior Policy Advisors across the ICF Team. Their roles will include:

- Providing senior HUD environmental policy expertise
- Providing advice and strategy on compliance with HUD's regulations
- Advising on the format for environmental reviews
- Developing combined HUD/FEMA formats, including coordination with FEMA officials

Mr. Bien recently retired as the Acting Director of HUD's Office of Environment and Energy where he was responsible for the development of HUD environmental policies and procedures and their enforcement, covering all HUD programs and assistance.

Ms. Dymkoski is a former HUD Environmental Officer with decades of experience in compliance with 24 CFR Part 58. She has been providing advice and guidance on compliance with HUD's environmental regulation to DCA and DEP since February 2013.

We will also tap a variety of subject matter experts in reviewing specific projects that have issues that need senior subject-matter expert input. ICF and our subcontractors have access to a large pool of environmental professionals who have worked on our NEPA projects (see Exhibit 1-6). These current employees have extensive experience in their areas of expertise, which cover all the subject areas required to comply with HUD's environmental regulations, and they will be available to assist in environmental document reviews or analysis preparation tasks, if needed. We do not envision that their involvement would be required for every review. Rather, we propose to engage these technical experts in a review task only where warranted by specific project circumstances.

In addition to these experts, ICF expects to use a pool of junior environmental professionals to conduct many of the straightforward review tasks. *Using junior staff will help reduce delivery costs and allow the process to be completed efficiently.* Our senior staff described previously will closely oversee the junior staff to ensure that they follow policies and procedures. As detailed in Tab 9, we have included a number of New Jersey-based firms including our small-business enterprise (SBE), partners to assist us in environmental reviews.

## APPROACH AND LEVEL OF EFFORT

A fundamental responsibility of the Program Manager under this contract is to assist DEP in managing the environmental review process for up to 15,000 environmental reviews associated with the seven DCA Action Plan programs listed in RFQ Section 1.1. The key to success for the Program Manager **is to ensure full compliance with HUD's regulations, while completing the NEPA environmental reviews expeditiously** so that disbursement of CDBG-DR funds is not delayed. We understand that DEP has developed and is operating a process to manage the environmental reviews. During the startup phase, we will evaluate that process, identify any potential improvements, and assume management responsibility for the process. The environmental review process that we develop will be integrated with the ERMS system and will allow DCA and DEP to demonstrate full compliance during future HUD audits.

Exhibit 1-7 illustrates and describes the flow of applications through the environmental review process. The basic concept of these steps covers Tier 2 checklists, categorical exclusion checklists, and more involved EAs. For managing the environmental review process, we have organized our approach into five basic management system requirements that address the 26 specific tasks (a through z) outlined in

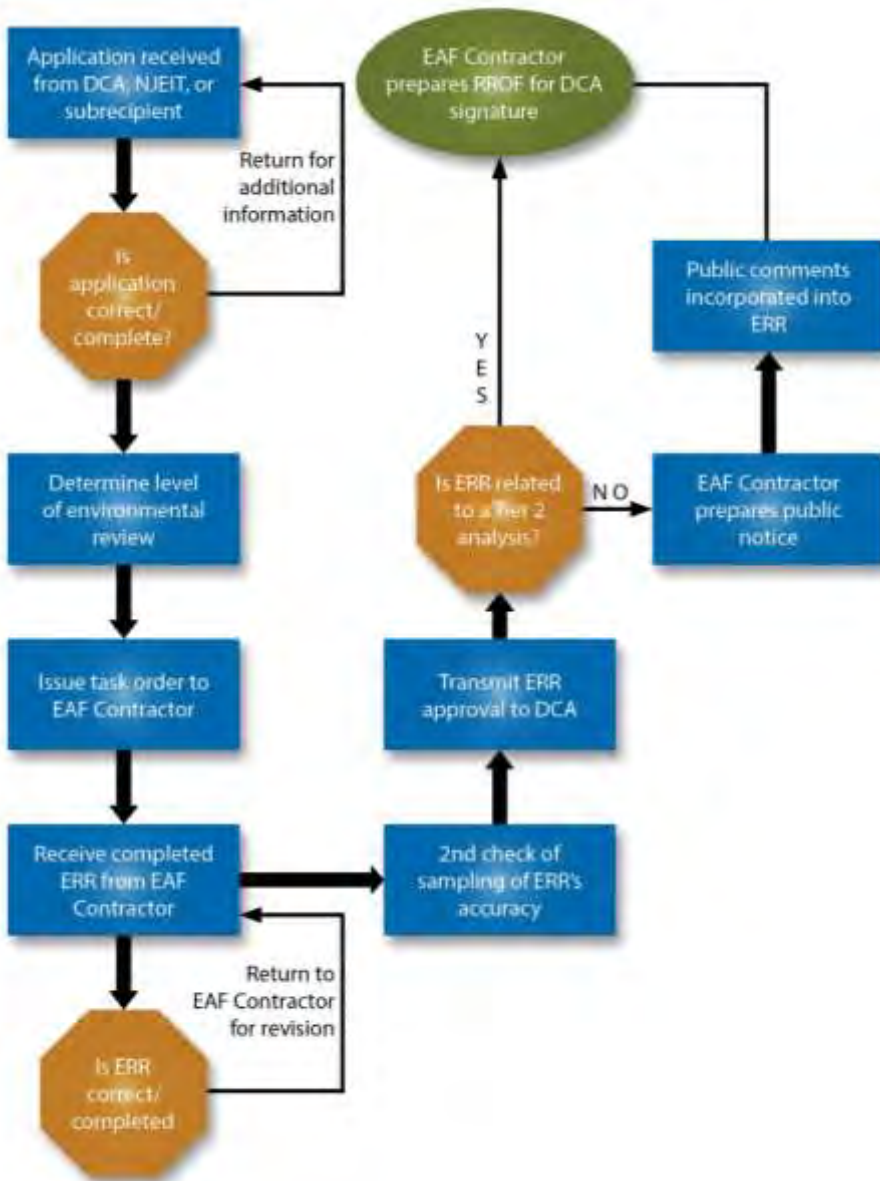




Section 3.1.4 of the RFO. These basic management system components are further defined by the activities described below. ICF fully expects this approach to be the subject of

discussion and refinement during the project startup period as we integrate with DEP's current thinking on the operation of the program.

**EXHIBIT 1-7 ENVIRONMENTAL REVIEW PROCESS OVERVIEW**



- Application is received from DCA or sub-recipient
- QA review of application to ensure complete information
- Environmental review level is determined (exempt, CENST, CE, EA, Tier 2 checklist)
- Applications are batched according to required review, program, and geographical location
- EAF Contractor task order is prepared and issued
- EAF Contractor completes the scope of the task order
- EAF Contractor's work is reviewed (including supporting documentation)
- Comments are provided to EAF Contractor (if work is insufficient)
- EAF Contractor submits new version of work
- EAF work product is reviewed and approved (including public notices if applicable)
- Public notices are issued
- Public/agency comments are reviewed (if applicable) and recommendations on responses developed
- EAF Contractor performs any additional work stemming from public/agency comments
- Final EAF Contractor work product reviewed
- ERR is reviewed and certified complete by ICF
- ERR and RROF is sent to DCA (responsible entity) for signature
- Complete signed ERR including all supporting files is uploaded to the IT system
- DCA (DCA's MIS system) informed of completion of ERR
- Conditions (mitigation measures) sent to DCA for inclusion in grant award conditions



## 1. PLANNING

Planning begins during the project startup phase as we engage with DEP on the process currently being used to manage the program. **We will seek to fully understand DEP's** approach, identify strengths and weaknesses in that approach, and recommend any improvements that may be required. The product of the planning component will be a set of written policies, processes, and workflow tools that will be communicated to the program management team. Listed below are the steps we will undertake during planning.

- Review lessons learned from DEP staff currently operating the program
- Seek input from EAF Contractors on strengths and weaknesses of current approaches
- Review existing policies, processes, and workflow tools
- Review existing ER templates for each level of review
- Review existing EAF Contractor tasking procedure and develop performance metrics
- Review ERMS system and develop integration with Program Manager IT system
- Establish records management protocols and system
- Identify reporting requirements and develop reporting tools
- Identify metrics to measure progress
- Establish procedures for external audits and fraud, waste, and abuse coordination
- Assign roles and responsibilities and define reporting structure
- Utilize procedures for responding to information requests (e.g., media, internal program, HUD, and public requests)
- Recommend and document revised policies, processes, and workflows from the review tasks

## 2. COMMUNICATION

Communication is vital for the success of the program. We will communicate the set of written policies, processes, and workflow tools refined through the planning component to the wider team. We also seek two-way communication with stakeholders to ensure that we collectively identify issues quickly so that we can resolve them. The steps to be undertaken in the communication component are listed below.

- Train DEP, EAF Contractors, and other staff on and revised processes, policies, and tools
- Meet regularly with DEP, EAF Contractor leads, and other New Jersey agencies to discuss progress, identify issues, share best practices
- Prepare weekly progress reports for DEP
- Provide input for program communications as required (governor's office and media)

## 3. ENVIRONMENTAL REVIEW PROGRAM MANAGEMENT IMPLEMENTATION

The implementation component involves operating the environmental review program according to the policies, processes, and workflow tools developed under planning. The goal of implementing the program is to operate both efficiently and effectively to ensure full compliance with HUD requirements. The steps listed below will be undertaken as part of this effort.

- Operate the processes and tools described under planning
- Implement the Environmental Review Program
- Continuously monitor staff availability/expertise and adjust as necessary
- Continuously monitor EAF Contractor availability and workload
- Implement the QA/QC plan

## 4. MONITOR PROGRESS AND IDENTIFY ISSUES

Ensuring the success of the program involves monitoring progress and identifying any issues that arise that are causing delays or non-compliance. Our approach to monitoring progress pulls up-to-date information from the IT system, incorporates elements of the communication component, and seeks to develop solutions to issues as they arise. The following steps will be undertaken in the monitor component.

- Assess performance against defined metrics
- Monitor EAF Contractor performance
- Monitor compliance with HUD and FEMA regulations
- Identify issues requiring correction from the QA/QC plan and monitoring tasks
- Identify corrective actions and any necessary policy/procedure/tool changes





## 5. CONTINUOUSLY IMPROVE PROGRAM

The goal of our management system approach is to remain nimble and allow for the program to be continuously refined to improve efficiency and effectiveness. We recognize that situations change over time and that programs need to be flexible to ensure optimal results. This component of the management system provides the feedback loop to the planning component previously described. The following steps will be undertaken in the improve component.

- Obtain DEP approval of policy/procedure/tool changes
- Maintain "open-door" policy of suggestions for improvement
- Implement approved corrective actions

### LEVEL OF EFFORT

The ICF Team will conduct the tasks a through z as requested in Section 3.1.4 of the RFQ. The cost for this activity is included as part of Line Item 2 of the Cost Quotation Price Schedule 1. The level of effort required in managing the environmental review process is based on the following:

- Up to 15,000 environmental reviews associated with the seven DCA Action Plan programs listed in RFQ Section 1.1. The majority of these reviews (up to 12,000) will be Tier 2 checklists associated with the RREM program. The remainder will be a mix of Tier 2 checklists, categorical exclusions, and full EAs. We expect all of the reviews to be completed in Year 1 due to the expiration of funding tied to legislation.
- Up to 6,000 environmental reviews associated with the programs contained in *Action Plan Amendment Number 7, Substantial Amendment for the Second Allocation of CDBG-DR Funds (Table 4-1)*. The majority of these reviews (up to 5,400) will be Tier 2 checklists associated with Homeowner Assistance Programs and Rental Housing and Renter Programs. The remainder will be a mix of Tier 1 EAs, categorical exclusions, and full EAs. We expect half of the reviews to be completed in Year 1 and half to be completed in Year 2.
- Based on the response to question 16 in RFQ Modification # 5, no environmental reviews would be conducted in Year 3 and hence, a low level of effort would be required in Year 3 to support activities such as audit preparation, QA/QC of records, and project completion.

## 1.6 Staff Augmentation (3.2)

### 1.6.1 State Historic Preservation Office Staff Augmentation (3.2.1)

ICF will provide the resources identified in Section 3.2.1 of the RFQ to assist the New Jersey State Historic Preservation Office (SHPO) in carrying out the technical, administrative, and clerical duties associated with the expected high volume of CDBG-DR project reviews, according to the requirements of Section 106 of the National Historic Preservation Act (NHPA) and the Hurricane Sandy Programmatic Agreement (PA). *We will complete the reviews in an efficient, high-quality manner, and give HUD and the SHPO complete confidence that the individual project analyses conducted by EAF Contractors properly fulfill the stipulations of the PA.*

ICF's proposed project team includes recognized experts in conducting Section 106 compliance and other state and local regulatory processes for historic properties. We have successfully assisted Federal and state agencies in conducting Section 106 review in 49 states and possess specialized experience with HUD-funded projects and programs. Our experience fulfilling the responsibilities of Section 106 includes: providing SHPO review assistance under the provisions of a PA; identifying and evaluating historic properties by applying National Register of Historic Places (NRHP) criteria; analyzing projects for potential adverse effects; conducting consultation with SHPOs, local government agencies, Native American Tribes, and other consulting parties; and negotiating and drafting Memorandums of Agreement to resolve adverse effects.

ICF has recent, relevant experience helping HUD and SHPOs carryout complex, high-volume Section 106 programs similar to that called for by the RFP. These efforts include:

- The HUD-funded NSP2 in Michigan
- The ARRA-Funded Weatherization Assistance Program in California
- HUD-funded Projects in the City of Los Angeles

In 2012, ICF worked closely with the Michigan SHPO to develop and implement a program to quickly and efficiently process HUD NSP 2-funded projects involving historic **properties through Section 106 review. Prior to ICF's involvement, many of these projects had stalled simply because historic-era buildings were involved, and HUD's responsible entities had inadequate Section 106 experience.** ICF facilitated these reviews by coordinating consultation with the SHPO and other interested parties, supplying the



resources and guidance necessary to complete reviews, and helping to establish thresholds for evaluating historical significance, potential impacts, and mitigation. *ICF's involvement resulted in successful compliance with Section 106 and timely disbursement of Michigan's NSP2 funds.*

For the California Weatherization Assistance Program, ICF assisted the California SHPO by conducting Section 106 review for more than 10,000 individual undertakings under a statewide programmatic agreement for ARRA-funded projects. ICF worked directly with the SHPO to creatively streamline the review methodology described in the Weatherization PA for different aspects of the program. We crafted templates for use by multiple applicant groups to help establish consistency among contractors and developed efficient research and tracking tools to process the high volume rapidly, therefore ensuring timely release of Federal funding.

**ICF is currently the City of Los Angeles's** historic preservation consultant assisting SHPO for all HUD-funded projects in the city. ICF has held this role since 2006, during which time we have completed more than 1,000 individual project reviews. The work has required us to perform all aspects of the Section 106 review process, including: program management, determinations of NRHP eligibility, project compliance with **the Secretary's Standards for Rehabilitation, impacts analysis** and the resolution of adverse effects, mitigation, interested-party consultation, and drafting of standardized agreement documents. A large percentage of the projects reviewed under the PA have been funded by CDBG program funds. Through these reviews, ICF gained valuable experience with the CDBG program and its associated regulatory requirements that will benefit DEP with further efficiencies.

## APPROACH AND LEVEL OF EFFORT

As part of the staff augmentation, ICF has assembled a team of six highly qualified historic preservation staff best suited to conducting the range of Section 106 reviews under this program and will also provide two high-level clerical staff that will accurately enter data and findings. As required by the RFQ, ICF offers eight qualified personnel to assist the SHPO in carrying out the administrative and clerical duties associated with each CDBG-DR project submission. These additional staff will be located in the SHPO in Trenton and report to the Deputy SHPO. Although ICF would not supervise these staff, our historic preservation lead, Richard Starzak is available to provide high-level guidance and mentoring. Our staff augment includes:

- Three individuals meeting or exceeding the National Park Service's Professional Qualifications Standards for architectural history with three years of experience in the field of history, architectural history, or architecture. ICF will provide three staff who meet these requirements, 40 hours per week, for three years. ICF offers the following three staff to fill architectural history positions: Jessica Feldman, Dr. Monte Kim, and James Williams. ICF reserves the right to substitute staff to fill these positions over the three-year period.
- Three individuals who meet the National Park Service's Professional Qualifications Standards for archaeology with three years of experience in the field of archaeological preservation. ICF's subcontractor, CPR of Blairstown, offers the following three staff to fill the archaeological preservation positions: Dr. Douglas J. Pippin, Marie-Lorraine Pipes, and Brenda Lockhart Springsted (all three are Registered Professional Archaeologist (RPA) certified). ICF and CPR reserve the right to substitute staff to fill these positions over the three-year period.
- Two high-level clerical staff for logging the projects into SHPO's tracking system. To fill these two high-level clerical positions, ICF has partnered with CCN Resources, a New Jersey-based staffing firm that will respond to DEP's requirements.

Mr. Starzak and his team will consult with the SHPO and DEP to develop appropriately compliant but streamlined approaches to PA implementation and to expedite approvals by quickly approving straightforward applications.

Section 3.2.1 in the RFQ provides a list of Professionally Qualified Staff responsibilities (items a through h) to be undertaken by the eight staff provided as part of the staff augment under this program.

## LEVEL OF EFFORT

The ICF Team will provide eight personnel reporting to the Deputy SHPO as part of the historic and clerical staff augment requested in Section 3.2.1 of the RFQ for a period of three years. This is included in Line Item 3 of the Cost Quotation Price Schedule 1.

## 1.6.2 Additional Administrative Personnel Support for DEP (3.2.2)

The ICF Team is prepared to respond to DEP's administrative personnel support requirements using a local New Jersey subcontractor, CCN Resources, to provide existing staff or through hiring. As part of the startup, we will work with the



State Contract Manager to identify immediate needs and provide additional administrative staff to be located in DEP's Trenton offices as the program evolves.

Our management team will support the placement of these staff and oversee their on-boarding process, training, and ongoing performance. We will work with the State Contract Manager in providing these personnel for such tasks as data entry, financial tracking and invoice processing, permitting review assistance, and general administrative and central support functions as part of DEP's work.

If a highly skilled position is identified, our partners are unable to provide the right staff, ICF can use several methods to identify, recruit, and hire personnel including our 26 experienced in-house recruiters. *Mr. T. Clark, ICF senior recruiter with 10 years of experience, will lead this effort for ICF and utilize our corporate resources systems and tools that ensure our success in identifying and hiring candidates on a short- and long-term basis.*

### APPROACH AND LEVEL OF EFFORT

ICF will partner with CCN Resources, a New Jersey-based staffing firm that will respond to DEP's requirements by submitting candidates to the ICF Project Manager. ICF and CCN will jointly review resumes and interview potential candidates. When a candidate is selected, his or her resume will be presented to DEP. We will arrange for DEP management to conduct interviews of potential candidates at DEP's preference. Once we receive DEP approval on a candidate, he or she will receive training from the ICF Assistant Project Manager on how to support DEP. ICF will supervise the additional staff supporting DEP, but the intention is they will remain CCN employees.

ICF and CCN currently work together to support DCA where we are providing a similar process for temporary staff; thus, our process for staffing is established and easily implemented. CCN also has experience staffing customer service coordinators for large nonprofit in support of disaster relief efforts. More information about CCN is located in Tab 9.

Quickly locating staff to meet evolving requirements is imperative, but speed must be coupled with effective and high-quality staff orientation and training, as well as human capital management, monitoring, and problem resolution processes. Our staff augmentation solution includes:

- Use of standardized processes and templates that facilitate a clear understanding of client requirements, which helps us find the right staff resource.

- Standardized training for augmentation staff so they understand the overall context of the work the client is performing.

Our approach is based in part on the lessons we learned after Hurricanes Rita and Katrina, where, *within 90 days, ICF stood up 14 housing assistance centers and fielded a fully trained and functioning team, which eventually totaled some 2,300 employees, with 80% of the staff hired locally.* This ramp-up was carried out in storm-ravaged communities that did not have even the most basic infrastructure.

Once we identify new employees, ICF will use our proven Rapid Assimilation Program for on-boarding augmentation personnel. This program is a set of procedures we have developed to ensure that all employees know their job assignment and objectives, how to access support, and their role in supporting DCA. ICF uses a similar process when on-boarding our own staff. For the administrative support personnel, our training will focus on:

- Recognition that the assigned team is serving DEP, and the customer's needs and interests are of paramount importance.
- Awareness from across the team that ICF is fully accountable for all performance.
- Awareness of career choices following temporary service and expectations so that we can support staff as they support DEP.
- Commitment in organizing and managing the project, sharing responsibilities, and who to go to for resources, advice, or recommendations.

ICF will provide day-to-day management of augmented staff, resolving performance and interpersonal issues and dismissing staff who do not meet performance expectations.

### LEVEL OF EFFORT

As directed by the State Contract Manager under task orders, the ICF Team will provide additional administrative support personnel to work in DEP's Trenton offices to assist DEP.

## 1.7 Interfacing with DEP or State (3.3)

Given the sources of recovery funding, and the involvement of multiple state and Federal agencies in funding, permitting, review, and regulatory functions, the ICF Team believes that collaboration and communication are the key to a successful disaster recovery effort in New Jersey. To this end, we will participate in interagency meetings at the request of the



State Contract Manager. In addition, we will suggest **meetings for the State Contract Manager's consideration** when we identify specific topics that we think would benefit from interagency discussion. These meetings will serve to align knowledge and understanding among agencies regarding the status of disaster recovery program and provide a forum to agree on environmental review management protocols and process. Most importantly, they will establish open lines of communication, which will foster productive working relationships among governmental stakeholders.

#### LEVEL OF EFFORT

The ICF Team will conduct meetings as requested in Section 3.3.1 of the RFQ and listed above. The cost for this activity is included as part of Line Item 2 of the Cost Quotation Price Schedule 1.

##### 1.7.1 Meetings (3.3.1)

Effective communication between and among project and state staff is critical to achieving success. For the team to perform effectively, all parties must share information regularly to keep the lines of communication open, address challenges, complete the activities, and ensure that the program is performing in a coordinated fashion. We will use regular and effective communication among the ICF Team and with DEP and others to help keep activities on track and identify and resolve issues as they arise.

#### APPROACH AND LEVEL OF EFFORT

As shown in Exhibit 1-8, as Program Manager we plan to

**hold daily internal "standup" meetings (half hour or less)** for the key staff to ensure all are informed on recent accomplishments and what still needs to be done (which we anticipate could be adjusted frequently), with emphasis on immediate, rate-limiting activities. In this context, we will share problems and make assignments for resolution or adjusted if needed. We also plan to hold weekly internal meetings to assess status and confirm assignments for the coming week.

We also propose to have scheduled weekly meetings with DEP and additional meetings as directed, but also plan to communicate on an ongoing basis, probably multiple times each day, as we work together to establish and provide the support needed to enable distribution of program funds. We will highlight issues and decisions required of DEP in order to move the programs forward. We will provide as much lead time as possible for DEP to address the issues raised, recognizing that activities will progress very quickly, particularly during startup.

##### 1.7.2 Communications (3.3.2)

ICF understands the State of New Jersey's commitment to conduct its Superstorm Sandy recovery efforts with utmost integrity and accountability. In accordance with Governor **Christie's Executive Order 125**, dated February 8, 2013, ICF will assist DEP and/or DCA with maintaining the integrity and accountability of Federal reconstruction resources they receive and distribute. To accomplish this, ICF will develop program management policies, procedures, and protocols that adhere to the highest ethical standards and provide for transparency at all levels. ICF understands the public interest

**EXHIBIT 1-8. PERIODIC MEETINGS**

Communication	Designated ICF Staff	Recommended Frequency
Internal program management "standup" meeting	Project Manager/management team/other key staff	Daily
Meeting with State Contract Manager and designated DEP staff	Project Manager/management team	Weekly
Meeting with DEP historic preservation staff	Historic Preservation Manager/Key Historic Preservation staff	Weekly or as needed/directed
Email/telephone contact with State Contract Manager and designated DEP staff	Project Manager/management team	As needed/directed
Specific progress/status reports, including cost controls to State Contract Manager	Project Manager/management team	Monthly
Issue tracking and fraud, waste, and abuse coordination (task order)	Project Manager/management team	As needed/directed
Appeals (task order)	Project Manager/management team/Program Development Specialist	As needed/directed





in the project and that part of this effort will involve effective and transparent communications with stakeholders, including applicants, elected officials, and other interested parties.

### APPROACH AND LEVEL OF EFFORT

As ICF reviews the policies and procedures and the ERMS that have been established by DEP, we will determine the best approach for establishing a mechanism for communicating status to applicants and other parties. Our communications plan will draw from our experience in other disaster recovery efforts, such as ICF's disaster recovery work in Louisiana, where it was also very important to manage expectations and the message being given to applicants, the media, and elected officials. In these efforts, it is important to be able to provide up-to-date and accurate information on a timely basis. Our approach will be focused on that goal.

Our communications plan will incorporate elements such as fact sheets on the environmental review process that can be distributed to the media, the public, and other stakeholders. **These fact sheets will draw on existing information on HUD's review process.** The aim is to educate stakeholders and illustrate expected timeframes for the environmental review process. Our communications plan will also outline the development of progress reports, including the data that will be included and how the information will be presented to the public. We will also provide these progress reports to the **State Contract Manager and the governor's team, with talking points to highlight achievements.**

**We also anticipate recommending a "success stories" fact sheet** that highlights some of the program achievements and describes real recovery successes. This mechanism has been used on many previous efforts to distribute good news stories.

We will plan for the distribution of fact sheets and other information through the recovery Web site, newspapers, and other distribution methods. The communications plan will describe the above points in detail.

### LEVEL OF EFFORT

The ICF Team will prepare a Communications Plan as requested in Section 3.3.2 of the RFO. The cost for this activity is included as part of Line Item 2 of the Cost Quotation Price Schedule 1. FAQs and other outreach materials will be prepared through the issuance of a task order by the State Contract Manager.

### 1.7.3 Training of Staff (3.3.3)

The key to implementing the CDBG-DR environmental review process in a compliant and efficient manner is training the

**"how-to" in terms of**

process, procedure, and use of existing and new systems/tools. Training is critical for both DEP personnel as well as the EAF Contractors.

To improve the quality of and integrity of the environmental reviews by EAF Contractors, the ICF Team will identify specific areas that can be improved upon through training. The ICF Team proposes to prepare a Training Plan for the training of DEP personnel and EAF Contractors in conducting desktop and/or field assessments, and/or using the ERMS system. We will develop the plan with the following objectives in mind:

- Assure that stakeholders, primarily the EAF Contractors, understand and can accurately implement the environmental policies and procedures
- Teach stakeholders how

#### The ICF Team's Approach to Training

**Identify the knowledge gap or need:** What are existing gaps or needs? Discuss with DEP, interview the team, and review existing training and documents, files, reports, and data.

**Clarify the audiences:** Who needs to know, and what does each audience need to understand or be able to do? Identify groups, departments, and EAF Contractors needing additional training.

**Define the objectives:** How will DEP and others know if the knowledge transfer/capacity building was successful?

**Determine best methods:** What are the best ways to provide information given the content, audiences, objectives, and other constraints? For any given focus, one or more methods may be better than others.

**Design materials, as needed:** Adapt existing materials or protocols such as webinar slides or plans to meet objectives of knowledge sharing.

**Implement, as needed:** Carry out the plan based on schedule.

**Assess results, as needed:** Using performance metrics, pre- and post-assessments, or other tools, determine what worked, what did not, and how to improve knowledge transfer process in future.





to use the Task Order Tracker and other management information systems

- Ensure that EAF Contractors complete the HUD and FEMA desktop and field environmental assessments properly and in a timely manner
- Provide training on key environmental topics as those training needs arise (e.g., the Section 106 historic review process or calculating the acceptable separation distance for thermal and explosive hazards) or on common errors observed in EAF work

The ICF Team is well prepared to develop the training plan as well as design and deliver training for this project. For more **than 25 years, ICF has been one of HUD's premier providers of technical assistance and training.** We provide training for **HUD's OneCPD programs** (community planning and development) including CDBG, the HOME Investments Partnership Program, the NSP, and the homeless housing programs. We have worked across the United States to transfer our knowledge and experience of community development to staff of state and local agencies. Through more than 1,000 training and webinar deliveries, 100 publications, and 600+ grantee technical assistance engagements, we have been deployed to build capacity of government and nonprofit staff to run their community development programs. Examples of our work are found at [www.OneCPD.info](http://www.OneCPD.info), the Web site created by ICF under contract with HUD to provide easy access to community development tools, training, and products. The written materials make complicated laws and regulations understandable and practical. The training helps seasoned professionals improve the capacity and performance of their programs by learning about best practices and applications of program regulations to real-life situations.

The training team will be led by Kelly Price, the principal training designer and instructor for the HUD-funded environmental training prepared by ICF. *Ms. Price co-wrote and periodically updates the training curricula for HUD for how to comply with 24 CFR Part 58 environmental review requirements. She is also co-author of Basically CDBG, a comprehensive training and resource manual for HUD's Office of Block Grant Assistance, as well as various training curricula for states on environmental review processes and procedures.* Other professionals contributing to the training content depending on the subject may include Charlie Bien and Cathy Dymkoski, both HUD Part 58 experts, as well as members of our environmental review, historic preservation, and IT teams.

## APPROACH AND LEVEL OF EFFORT

As a first step to training, the ICF Team will prepare a training plan. The training team will convene an initial kickoff meeting for the training plan that will include DEP and other state representatives as well as ICF Team members. The purpose of the meeting will be to 1) obtain agreement on the overall structure/content of training; and 2) identify the specific types and training and reference materials that we should consider for incorporation in the plan. We will submit our draft plan to the State Contract Manager for review and approval.

The ICF Team will conduct the following activities after the State Contract Manager approves the plan and if determined that specific training would be required under a task order:

- **Design:** We will initiate the design of materials. For each activity in the approved plan, the ICF Team will document the learning objectives, provide a detailed content outline, and develop participant materials and training slides. The materials will be submitted to the State Contract Manager for review, comment, and final approval.
- **Implementation:** Our team will be supported by staff responsible for logistics – scheduling, registration, and technical setup.
- **Evaluation and Quality Assurance:** After each training course or webinar, the training team will request participant feedback. We use standard protocols, modified to capture information requested by our clients, to elicit comments on the quality, content and format, presentation materials, and delivery of training and related products. The training team will analyze participant feedback and prepare a report of findings for DEP. Based on the feedback and conversations and directions from DEP, we will update the training and materials.

*Note on Security: The ICF IT system incorporates user authentication as part of its security protocol. This user authentication allows us to track compliance with training requirements. Subject to DEP approval, we propose that users of IT systems not be granted full login credentials until they have completed the required and/or updated training.*

## LEVEL OF EFFORT

The ICF Team will prepare a training plan, which is included in Line Item 4 of the Cost Quotation Price Schedule 1. Once the State Contract Manager approves the plan, we will work under a task order and utilize existing and/or develop new



supporting training materials and curriculum and conduct the training.

## 1.8 Project Quality Assurance and Oversight (3.4)

Ensuring quality and overall program effectiveness requires structured quality management and oversight functions and processes. In Section 3.4 of the RFQ, DEP identifies seven key program management functions that work together to ensure that all appropriate financial, staffing, and logistical needs of the ICF Team and DEP team are met. These functions are intended to work independently from the technical environmental reviews described previously and provide an additional level of scrutiny that serves as a back-stop to those efforts.

As described in the sections that follow, ICF recognizes that DEP has already developed operations and policies to execute these functions. For each function, we will first evaluate existing programs, identify opportunities for improvement, and provide feedback on changes or enhancements. We will then execute the agreed-upon operations as appropriate.

### 1.8.1 Quality Assurance/Quality Control (3.4.1)

ICF uses a systematic approach to managing quality that is aligned with industry best practices. For all of our projects, **we adhere to the Project Management Institute's definitions** of quality assurance and quality control:

- **Quality assurance.** Determining whether the project is following organizational and project policies and procedures. Performing continuous improvement, quality audits, recommended changes, and corrective actions. We will ensure that staff is trained on the ICF QA/QC approach and the need for continuous improvement.
- **Quality control.** Measuring specific project results against standards. Testing, repairing defects, validating deliverables. We will ensure that records of measurement results are maintained, reviewed, and analyzed to assist in identification of continuous improvement opportunities, and where feasible to assist in the detection of fraud, waste, and abuse.

ICF recognizes the challenge of maintaining high-quality work products across the environmental review program,

given the time constraints, volume of reviews to be conducted, and the range of contractors and staff involved. While the Environmental Review function is responsible for conducting the actual quality assurance reviews of the ERRs, ICF will also monitor project-wide compliance with established policies, procedures, and processes. The purpose of this quality assurance program is to ensure that data meets requirements for quality, format, documentation, and accessibility, and is aligned with anticipated audit criteria.

### APPROACH AND LEVEL OF EFFORT

The QA/QC Plan serves as the guiding document for the QA program. Bon Provenzano will serve as our QA/QC manager, working independently from the environmental review function, with responsibility for developing and managing a QA/QC Plan. Mr. Provenzano will be involved in the **initial review of DEP's existing QA/QC procedures and policies**, including review of any existing QA/QC Plan. If a plan does not exist, he will work with DEP to incorporate relevant existing policies to develop a robust QA/QC Plan that will guide the implementation of this function. Such plans will follow the basic guidance outlined in the ISO 9001: 2008 industry standards on quality management systems. This plan will serve as the guiding document for ensuring the quality of our support under the Environmental Review function as well as our overall execution of the requirements of this RFQ.

**ICF's approach to QA/QC is derived from the systematic application of quality management principles inherent in the ISO 9001 Quality Management Standard, recognized worldwide as a best practice. An essential element of ICF's approach is the "Plan-Do-Check-Act (P-D-C-A)" framework.** The P-D-C-A model includes the following steps:

- **Plan.** Establish the objectives and processes necessary to deliver results in accordance with customer requirements and the organization's policies.
- **Do.** Implement the process on program specific activities.
- **Check.** Monitor and measure processes, products, and services against policies, objectives, and requirements.
- **Act.** Take action to continually improve process performance.

As part of this process, Mr. Provenzano will review any guidance materials that DEP has already provided to EAF Contractors to develop their adequate controls to comply with the applicable Federal and state requirements. If changes or enhancements are needed, Mr. Provenzano will



work with DEP to revise this guidance and communicate the changes to the contractors.

ICF will use the QA/QC process to ensure the Environmental Review Program meets the intent of Executive Order 125—making certain that resources are used in an ethical and transparent process. The QA/QC process also ensures adherence to internal program policies and procedures and compliance with external requirements from HUD and other Federal and state agencies. Mr. Provenzano and his team will follow a series of sequential steps that entail the necessary guidance, checking, review, approval, document tracking, and monitoring of all environmental review.

#### LEVEL OF EFFORT

The ICF Team will conduct QA/QC as discussed above and requested in Section 3.4.1 of the RFO. The cost for this activity is included as part of Line Item 2 of the Cost Quotation Price Schedule 1.

### 1.8.2 Appeals (3.4.2)

ICF will assist the State Contract Manager with the appeals process as it relates to environmental and historic preservation reviews. John Hansel, JD, an ICF expert consultant with more than 40 years of experience, will lead the appeals task. Mr. Hansel's **experience in developing and managing NEPA environmental protection programs and policies, mediations, negotiations, training, and implementation oversight to programs** will provide DEP with the level of expertise to evaluate appeals as they come up and to assist DEP and DCA in the appeal process.

#### APPROACH AND LEVEL OF EFFORT

As shown in Exhibit 1-9 we will work with the State Contract Manager once a task order has been issued with an appeal. Our appeals lead, John Hansel, will review the appeal to determine the specific action required and seek input, if needed, from either the environmental or historic function. He will review the ERR per the objections provided in the appeal and provide the State Contract Manager with a written initial evaluation and any risks identified. It may be determined necessary to seek additional information or clarification from the EAF Contractor as part of the review. Following the overall review, Mr. Hansel will present the conclusions to the State Contract Manager and assist in advancing the appeal process.

Mr. Hansel has performed similar work for ICF on the DOE NEPA Support to the Loan Guarantee Program Office. For this project, he worked closely with DOE to provide expert

assessment of the adequacy of the environmental information in loan guarantee applications.

#### LEVEL OF EFFORT

This activity will be conducted per task orders issued by the State Contract Manager.

#### EXHIBIT 1-9. ICF'S APPEALS TEAM IS LED BY AN ATTORNEY SPECIALIZING IN NEPA AND ENVIRONMENTAL COMPLIANCE

##### Appeal Filed with DEP

- Appeal filed with State contract Manager
- State Contract Manager Prepares Task Order

##### Follow Receipt of an Appeal Task Order

- Program Manager reviews appeal to determine action and appropriate functional responsibility
- Program Manager reviews the Environmental Review Record per objections provided in appeal
- If determined necessary, Program Manager will notify EAF Contractor to seek additional information and clarification.
- Program Manager will document the review and present conclusions to the State Contract Manager
- Program Manager will assist the State Contract Manager in the elevation of the appeal process

### 1.8.3 Compliance and Monitoring (3.4.3)

Compliance and monitoring is an element of the QA/QC program that specifically focuses on ensuring that ERRs are in compliance with appropriate HUD CDBG-DR, state, and Federal guidance and regulations. ICF's proposed approach for conducting these activities is addressed in Section 1.5, Environmental Reviews.

As part of our QA/QC process, the ICF Team will build an approach to using data analytics and incorporate best practice acceptance sampling methods such as those based on Military Standards and American National Standards Institute guidance, to sample a statistically significant number of reviews and ensure appropriate levels of quality are maintained throughout the program. We will further ensure that the program will pass all audits from regulatory authorities.



Charlie Bien and Cathy Dymkoski will serve as senior subject matter experts to carry out this function of the overall QA/QC program in support of Mr. Provenzano. Mr. Bien was **the Acting Director of HUD's Office of Environment and Energy and was also the Director of HUD's Environmental Review Division** where he was responsible for establishing 24 CFR Part 50 and Part 58 review requirements and for environmental review compliance. He performed reviews on more complex and controversial projects and was responsible for supervising HUD environmental staff who conducted reviews. Ms. Dymkoski is a former HUD Environmental Officer with decades of experience in compliance with 24 CFR Part 58. She has been providing **advice and guidance on compliance with HUD's environmental regulation to DCA and DEP since February 2013. Since 2001, she has been the lead technical advisor to ICF staff regarding HUD's environmental review requirements (24 CFR Parts 50 and 58), NEPA, and other associated Federal laws and authorities.** *Their combined experience makes our team uniquely qualified to support the compliance and monitoring task and to ensure that environmental reviews meet all HUD regulatory standards.*

## APPROACH AND LEVEL OF EFFORT

ICF views the compliance and monitoring task as central to the success of the Environmental Review Program. We will demonstrate compliance with regulatory and program policies and procedures to ensure transparency and to facilitate future HUD audits. The compliance and monitoring task is interrelated with the QA/QC task because they both involve a component of ensuring regulatory compliance. While the QA/QC function addresses the performance of activities throughout the project, however, the compliance and monitoring task is focused on meeting the goals and objectives of the CDBG-DR grant and ensuring that ERRs meet the expected levels of compliance for future audits.

The following steps illustrate the concept of developing and operating the compliance and monitoring process.

- Set goals of monitoring program.
- Establish monitoring protocols, including the frequency and number of monitoring events such as to be deemed statistically significant and representative of whole.
- Align protocols with the approved policies and procedures.
- Conduct senior review to ensure all processes and policies meet CDBG, state, and Federal requirements.

- Assemble the sample set of environmental reviews (at each ER level (e.g., Tier 2 documents, EAs); the sample set will include documents covering the complete set of EAF Contractors.
- Input the entry of the sample set of environmental review information and supporting documents into the IT system; ensure accuracy and completeness.
- Review sampled ERRs and determine whether they are in full compliance and whether the correct (environmental) decisions were reached for each application.
- Develop findings and report out to the QA/QC lead.
- Develop corrective actions and recommendations to address findings.

## LEVEL OF EFFORT

The ICF Team will conduct compliance and monitoring as discussed above and requested in Section 3.4.3 of the RFO. The cost for this activity is included as part of Line Item 2 of the Cost Quotation Price Schedule 1.

### 1.8.4 Issue Tracking and Fraud, Waste, and Abuse Coordination (3.4.4)

The ICF Team will develop a systematic approach to detecting and preventing fraud, waste, and abuse. The CDBG-DR Program is subject to audit or other oversight by multiple Federal and state agencies. As with any Federal and state program, there are substantial general and specific compliance requirements that must be addressed by both the prime contractor and subcontractors. We will ensure that processes are in place to both encourage and monitor compliance to a fraud, waste, and abuse protection program.

Within the ICF Team, responsibility for waste, fraud and abuse protection program will be the responsibility of Brett Rickman, who will develop a unified and consistent investigatory and internal protection function that monitors programs and ensures that all procedures and employees are consistent with internal controls and policies. He will ensure that all anomalies are investigated and properly resolved. It will be our policy to remain vigilant to changing circumstances that may require alternative approaches to efforts to protect against fraud, waste, and abuse. *Mr. Rickman is a seasoned lawyer with more than 20 years of experience in both waste fraud and abuse and contracting making him highly qualified to head this important function.*





The ICF Team will perform management, file review, reporting and document management, and coordinate with contractors procured for integrity, fraud, waste and abuse monitoring as required for internal and external audits (Federal, state, and legislative), potential fraud investigations, and responses to Open Public Records Act requests, subpoenas, and support of potential legal actions. As part of our issue tracking and fraud, waste, and abuse coordination effort, the ICF Team will file documentation, manage documentation, perform quality control, report, and ensure program and Federal compliance. The ICF Team will apply best management practices to facilitate external audits and respond to external audit findings; identify and research any potentially fraudulent environmental review records; coordinate as requested by the State Contract Manager with appropriate prosecutorial agencies; respond to requests for documents and subpoenas; and report findings to the State Contract Manager.

**ICF understands the State of New Jersey's commitment to** conduct its Superstorm Sandy recovery efforts with utmost integrity and accountability. In accordance with Governor **Christie's Executive Order 125**, dated February 8, 2013, ICF will coordinate with designated accountability officers to assist DEP and/or DCA with maintaining the integrity and accountability of Federal reconstruction resources they receive and distribute. To accomplish this, ICF will develop program management policies, procedures, and protocols that adhere to the highest ethical standards and provide for transparency at all levels.

**ICF's program management framework will be designed to** facilitate internal and external audits and to respond with corrective action to audit findings. For example, ICF recommends using the grant number assigned to an application at program intake as the unique record locator linking all task orders, supporting documents, environmental assessments, and historic preservation reviews associated with that application/site. In this way, all information associated with an application/site would be linked end-to-end from application to project completion, thus facilitating audits.

## APPROACH AND LEVEL OF EFFORT

In order to accomplish this task, we will:

- Develop detailed procedures to detect and prevent waste, fraud and abuse relating to the preparation of environmental assessments and historic preservation reviews.

- Coordinate with DCA's compliance and monitoring staff to ensure that program management policies, procedures, and protocols are adequate and aligned across New Jersey disaster recovery efforts.
- Coordinate with contractors procured by the State of New Jersey for integrity, fraud, waste, and abuse monitoring.
- Conduct internal training of ICF staff and external training of EAF Contractor staff regarding policies, procedures, and protocols surrounding waste, fraud, and abuse prevention.
- At DEP's and/or DCA's instruction, post environmental assessment and historic preservation review documents on an appropriate state Web site.
- Post fraud prevention notices within all ICF and EAF Contractor offices where staff working on New Jersey's Federal reconstruction projects are assigned. These notices shall include the toll-free hotline established by the state comptroller for reporting of fraud, waste, or abuse of Federal reconstruction resources.
- At DEP's and/or DCA's instruction, prepare information concerning the allocation and expenditure of Federal disaster relief funds to be posted on an appropriate state Web site.
- At DEP's and/or DCA's instruction, respond to requests for information under the Open Public Records Act.

Finally, our program management will respond to any problems identified through the fraud detection activities. If indications of possible fraud are found among program participants, the procedures for validating data and approving payments will be reviewed to ensure that they are capable of preventing fraud. If the procedures are inadequate, the program management will identify revised processes and methods that will reduce the likelihood of fraud occurring undetected. If we find indicators of potential fraud among program implementers, we will investigate the issues and take steps to discipline employees, up to and including dismissal. If business processes and procedures need to be strengthened to prevent fraud by program staff, the program management will revise the processes as needed.

## LEVEL OF EFFORT

This activity would be conducted per task orders issued by the State Contract Manager.





### 1.8.5 Document Management and Records Retention (3.4.5)

A fundamental component of project assurance and oversight is the process by which documents and records are inventoried, classified, tracked, protected, stored, archived, and disposed of. Documents covered by the records management program will include both physical documents and electronic images (e.g., paper documents, emails related

#### Benefits of Robust Records Management

- Helps deliver services in a consistent and equitable manner
- Protects records from inappropriate and unauthorized access
- Facilitates effective performance of activities throughout the organization
- Provides continuity in the event of a disaster
- Reduces security risks from unauthorized access
- Ensures compliance with statutory and regulatory requirements including archival, audit, and oversight activities

to sub-recipients or EAF Contractors, correspondence, training material, and relevant policies and procedures).

As required in the RFQ, the Program Manager will be responsible for creating and implementing a records management program that ensures compliance with the DEP document management and records retention policy. For this program, it will be particularly crucial that DEP have the ability to easily locate and retrieve relevant materials. In

addition, materials have to be maintained in a consistent format that is compatible with DCA requirements because DCA is the responsible entity for the HUD CDBG-DR grant. The challenge is that multiple EAF Contractors have been and will be the source of the material, and may be using different formats, platforms, and even protocols for what is considered "important to keep." Our approach will be to develop a records management program and processes that ensure that documentation retained is in the right format, is the right material to maintain, and is easily retrieved. ICF will work with DEP to determine what guidance has been given and how the EAF Contractors maintain their documents. We will then work with DEP to develop a comprehensive approach that the EAF Contractors will be required to follow

for inventorying, classifying, storing, and disposing of documents. Once the overall document management procedures are in place and being executed, we will then work with DEP to assess the backlog of materials that have already been produced to date under this effort.

ICF is proposing Aleida Johnson as the Records Manager responsible for developing and implementing the document management and records retention program. *Ms. Johnson brings more than 15 years of experience in data research and records management in New Jersey and has a Records Management Certificate.* As a starting point, Ms. Johnson will work with ICF's Project Manager to establish an overall policy that:

- Emphasizes the importance of records management and distinguishes it as a key part of the organization strategy.
- Sets expectations for the way employees participate in proper records management in the normal course of business.
- Identifies and establishes the responsible authority for records, content, and information in the organization.

#### APPROACH AND LEVEL OF EFFORT

##### PROGRAM ELEMENTS

ICF will establish and implement a records management program so that information is timely, accurate, complete, cost-effective, accessible, and usable. This program will provide QC for the accountability of records and documents through tracking of record creation, access, modifications, deletions, and site transfers.

ICF will establish systems, procedures, and guidelines addressing the following components of records management:

- Records inventory and classification—ICF will develop processes for managing documents and forms upon receipt from sub-recipients or others, including updating the IT system. ICF will ensure that conversion of hard-copy records to digital images complies with the state image system certification processes. Intake processes will also include controls for document filing and incoming mail and fraud prevention.
- Storage—ICF will develop a process that will organize document storage in a logical and easy-to-use manner to allow for easy retrieval by the program or in response to public record requests. We will store all records in a dedicated, secure portal, and we will ensure that the



storage system includes backup and recovery procedures, with contact information for all who will be involved in response and recovery and their responsibilities.

- **Research and reporting**—As part of the overall program, ICF will establish a retrieval processes that includes a search functionality to enable users to find documents by address, program name, sub-recipient, applicant name, and application ID. This process will support any research inquiries regarding missing documents or any pertinent information required. It will also enable the ICF Records Manager to respond to requests for records or work products from the State Contract Manager, state and Federal monitors and auditors, and other state or Federal entity having jurisdiction over the use of funds provided through this program.
- **Retention scheduling and disposition**—In coordination with DEP, the ICF Records Manager will establish and implement a schedule for regular review of document retention and the process for proper disposition.

ICF has a proven track record providing comprehensive records management. As part of a five-year Program Management contract with the DOE Office of Electricity and Energy Reliability, ICF currently provides a full-time team to develop and implement a records management program. This support involves the inventorying, storage, management, and ultimate disposition of more than 15,000 physical records received and managed by DOE. ICF also oversees the scanning, indexing, classification, and uploading of vital records, correspondence, human capital, mission assignments, and budgetary records utilizing a robust DOD 5015 certified electronic document management system. On the Louisiana CDBG-DR Program, ICF built a SharePoint-MS based document management system that supported a program administering 120,000 grants and supported more than 40 audits that passed without a single significant finding.

Our records program at DOE has been a proven leading example of industry standard best practices in Federal records management. By implementing content-specific and general records training, ICF has created culture of recordkeeping awareness within the department. Through our proven centralized records system, we have also created an efficient record retrieval system during pending litigation or case reviews.

## IMPLEMENTATION APPROACH

During project startup (and throughout the project as appropriate), Ms. Johnson will undertake the following activities:

- **Conduct inventory**—Identify and quantify all organizational records paper and electronic to ensure each series of records are analyzed for the purposes of record retention, legal protection, and improvement opportunities.
- **Assess paper and electronic records**—Define how records are currently being used according to physical storage requirements, server requirements for electronic documents, and current intake of records received routinely. Verify that records are following state certification process for images and documents transmitted through the system. Make recommendations derived from analysis utilizing best practices of both physical and electronic media.
- **Prepare business continuity file plans**—Document the indexing and classification schemes for arranging, storing, and retrieving records by records series. Establish a Vital Records file plan for disaster recovery to identify and protect records that are necessary for the continuation of operations under emergency conditions. Regularly perform audit and quality control exercises to guard against the neglect of vital records. Document the plan to account for offsite storage as well as backup centers and how records should be managed in an emergency.
- **Conduct training**—Conduct annual general records training for email, electronic, and permanent paper records. Conduct periodic training of administrative staff on management of divisional file plans and business continuity vital records file plans.
- **Capture and scanning**—Upon the receipt of new applicant documents, utilize the file plan for the classification and store records for efficient retrieval. Facilitate regular quality checkpoints to ensure records received are managed within a timely fashion. Maintain inventory matrix of records received and provide regular audits of ERR files in designated secure environment.
- **Quality control and system audits**—Conduct internal monitoring efforts to establish program sufficiency, validation, and possibly recommend opportunities for improvements that will be reflected in the training.



## LEVEL OF EFFORT

The ICF Team will conduct document management and records retention as discussed above and requested in Section 3.4.5 of the RFQ. The cost for this activity is included as part of Line Item 5 of the Cost Quotation Price Schedule 1.

### 1.8.6 Accounting and Reporting (3.4.6)

ICF, as the Program Manager, will be responsible for ensuring that task orders for environmental assessments are allocated on a rotational basis among the EAF Contractors based on a process and procedure approved by the State Contract Manager. We will execute this approach in a balanced manner, taking into consideration the quality and timeliness of delivery and the responsiveness of the EAF Contractors. ICF will adhere to a process and procedure for handling all of the accounting functions associated with the task orders, so that funds are drawn and disbursed in a timely manner and in compliance with CDBG-DR, FEMA, and other applicable Federal and state requirements. Additionally, ICF will be responsible for all financial and other related reporting to the state as it pertains to the task orders, both standard production reports on funding/expenditure status and progress/workflow as well as various ad hoc reports that are to be expected.

Essentially, ICF will perform the full gamut of accounting and reporting functions that are typically found in subcontractor management. For four decades, ICF has managed teams with dozens of active subcontractors under Federal and state **contracts**. ICF's overall approach has been to work collaboratively with such firms to assign the best resources to respond to task order requests. ICF recognizes that **management of the state's EAF Contractors requires more** than effective control; high-functioning teams are most productive in a collaborative setting that provides proportional rewards and incentives for high performance.

## APPROACH AND LEVEL OF EFFORT

This important task will be led by Elaine Adams, who has more than *25 years of business management and administration experience in local government service with the City of Trenton. In addition to expertise in Federal grant accounting, reporting, and compliance, Ms. Adams brings solid collaboration and communication skills honed as an interdepartmental liaison and coordinator of cross-departmental initiatives drawing on multiple funding sources.* Ms. Adams holds a B.S. in Business Administration and Accounting from Stockton State College in Pomona, New Jersey.

In accounting for Federal funds going to EAF Contractors, ICF will have a documented process and procedure in place to ensure that the funds are used only for the purposes intended.

As noted in the RFQ, a key component of this process is reconciliation. Through internal reconciliation, ICF verifies that invoices submitted by EAF Contractors for work performed are consistent with task order requirements and commensurate with progress made, are compliant with Federal and state guidelines, are mathematically correct, and other standard checks.

Through external reconciliation, ICF verifies and compares our internally reconciled records of funds disbursed to EAF Contractors to the corresponding records of drawdowns of Federal funds by DEP and such drawdown data as shown in DEP/DCA systems.

We will track and resolve any discrepancies we identify during our reconciliation processes with the EAF Contractor and/or State Contract Manager, as applicable. Conducting these related reconciliations on a frequent basis—at least monthly—helps ICF ensure and document to the state that it is properly exercising its fiduciary responsibilities to safeguard Federal funds.

ICF has an intimate knowledge of CDBG-DR and HMGP regulations, which we will apply in designing and implementing the accounting and reconciliation process. We will share this knowledge and our recommended practices with the EAF Contractors through checklists, FAQs, compliance packets, and other materials so that discrepancies can be mitigated and, preferably, avoided in the first place, rather than addressed after the contractor already has incurred costs. Such a proactive approach is a hallmark of ICF's oversight of other contractors in programs like this and helps ensure that there are no financial surprises on our watch as the Program Manager. We have found this preventative approach particularly helpful in addressing complicated Federal requirements across firms that may not have as much experience as ICF in performing such Federally funded work, particularly if it is on an urgent basis.

ICF intends to incorporate a Task Order Tracker module into our centralized IT system, or as a separate system/tool, to assist in efficiently performing, documenting, and reporting on all accounting and reconciliation matters. The module will support our accounting functions at the level of individual task orders and in aggregate, as well as on a monthly and cumulative basis, and also include budgetary projections versus actual variance reporting. This module will be leveraged for purposes of our coordination with the State



Contract Manager as well as with other DCA and DEP systems. The module will facilitate transparency and reviews/audits by HUD, FEMA, New Jersey officials, and others by having a ready and comprehensive archive available of all transactions with EAF Contractors. Lastly, the module will assist ICF in efficiently processing EAF Contractors' monthly invoices so that they can receive payment from the state on a timely basis.

Some of the key features of our Task Order Tracker module pertaining to the accounting function include:

- Data files generated in a manner that DCA can, in turn, upload into the Disaster Recovery Grant Reporting system.
- Status of ICF review and approval process for EAF Contractors' invoices, to facilitate timely drawdown requests by DEP.
- Log and resolution status of reconciliation discrepancies, adjustments, or other issues identified and being tracked in EAF Contractors' task order invoices (e.g., versus task order requirements and Federal/state guidelines).
- Log of retainage amounts associated with task order invoices.
- Log of contractual performance standards associated with task orders, including any violations.
- Status of DEP drawdown batches associated with task order invoices.
- Variance between monthly and cumulative budget projections for task orders and amounts invoiced by EAF Contractors as well as run-rate projections.
- Status evaluations of the EAF Contractors by our QA/QC team for quality and completeness of work performed.
- Repository of weekly and monthly status reports submitted by EAF Contractors.

## FINANCIAL REPORTING

Timely financial and other related reporting on the progress of EAF Contractors to DEP is vital in being able to effectively manage a high-volume, important, and fast-moving contract like this for program management services. In addition, transparency in reporting will facilitate credibility and trust in **the state's** grant program and, in turn, foster success for all parties involved. ICF understands the range of production reports that are expected to be needed by the state; we also are prepared to create the many new financial reports that

certainly will be needed during the life of this contract, including on a quick-turnaround basis.

During the startup of the contract, we will identify the initial specifications for production reports with the State Contract Manager, quickly develop mockups for review, and then generate refine the reports over time so that they are **responsive to the state's needs. Some representative financial** and other related production reports are likely to include:

- Pipeline Reports—These reports depict the status and volume (or throughput) of task orders and EAF Contractors throughout the environmental review and records process, including any backlog that may exist.
- Financial Reports—These reports show the status of funds requested by EAF Contractors, drawdown batches, and our reconciliations/adjustments.
- Budget Reports—These reports are intended to assist with cash-flow management, projecting funds requests by EAF Contractors over time, based on assumptions shown, and, in turn, projecting drawdowns.
- Compliance Reports—These reports provide visibility to the ICF Project Manager and State Contract Manager on issues that have been identified with EAF Contractors and the status of their resolution, such as reconciliation discrepancies with task order Invoices, violations of contractual performance standards, and similar matters.
- QA/QC Reports—Results from the periodic evaluations of both ICF and EAF Contractors' compliance with policies, processes, and procedures (as outlined in the QA/QC plan).
- Weekly and Monthly Status Reports—As specified in Sections 3.1.4 (v) of the RFQ, the EAF Contractors provide these reports to DEP.

## LEVEL OF EFFORT

The ICF Team will conduct accounting and reporting as discussed above and requested in Section 3.4.6 of the RFQ within 30 Days of ERMS and SIROMS activation. The cost for this activity is included as part of Line Item 2 of the Cost Quotation Price Schedule 1.

## 1.8.7 Reporting and Documentation (3.4.7)

One of the key tasks the State Contract Manager must undertake is to document and report the program results to HUD, FEMA, and the state. ICF is prepared to support this requirement through the management and retention of all records, documents, and communications of any kind



(including electronic in disk or print form) that relate in any manner to the award and performance of this contract.

ICF is experienced in managing and reporting on contract performance for large-scale programs. For more than 20 years, we have worked with Federal, state, and local contracts to provide detailed monthly reports on budgets and costs, milestones and timelines, status of products, and outstanding issues (if any). We utilize existing, detailed procedures for documenting our results and maintaining our files. We also have developed innovative approaches to reporting using geographic information systems (GIS) and data analytics, which adds to the understanding of the report by the reader.

#### LEVEL OF EFFORT

ICF will maintain all records related to products, transactions, or services under this contract for a minimum of five years from the date of final closeout of the state Disaster Recovery Program. Records will be readily available to the New Jersey Office of the State Comptroller for audit and review upon request, pursuant to N.J.A.C. 17:44-2.2, and for disclosure to other parties for audit and review.

ICF is prepared to retain the records beyond the five-year mark if required as directed by the state. ICF will maintain a dedicated SharePoint site for storage and archiving of all disaster-related records, which will be backed up on a daily basis and stored on backup servers as part of ICF's normal business practices.

#### LEVEL OF EFFORT

The ICF Team will conduct QA/QC as discussed and requested in Section 3.4.7 of the RFQ. The cost for this activity is included as part of Line Item 2 of the Cost Quotation Price Schedule 1.

### 1.8.8 Deliverable Milestones and Performance Guarantees (3.4.8)

At the start of the contract, the ICF Project Manager will work with DEP to identify and agree upon a format for reporting progress towards meeting contract performance standard, as set forth in Section 5.9.4 of the RFQ. ICF will then provide DEP with daily reports through the ERMS or our IT system using these formats.

#### APPROACH AND LEVEL OF EFFORT

Within 15 days of the contract execution, ICF will establish an office in the Trenton area, conduct a meeting with the EAF Contractors, and conduct reviews of existing processes and

procedures and make recommendations for necessary changes. The first status report will indicate the list of policy and procedures to be reviewed so that progress toward their completion can be easily monitored.

ICF has also developed a deliverable list and schedule to match the Cost Quotation Price Schedule 1 in Tab 11 (see Exhibit 11-4).





## 2. Start-Up Team

The ICF team brings an experienced and dedicated group of staff to DEP to set up and get the program going. Leading the team is Scott Ledford, Project Manager. For further details on **Scott's and our core start-up** team, please see Tab 1. In addition to our in-house staff, we propose a team of six local subcontractor firms with extensive knowledge and experience within New Jersey. An overview of each firm is provided in Tab 9. Included in this section, per the RFQ instructions, is a table (Exhibit 2-1) listing our proposed in-house and subcontractor staff members anticipated to support the 15-day start-up tasks (a-f) as described in Section 3.1.1.3 of the RFQ. The table also lists staff that will begin following execution of the contract, but outside of the start-up activities listed above.

The ICF team has identified three major areas where a specific role is necessary to lead the operation as part of the 15-day start-up team. These key management positions are identified as: program management, HUD/NEPA environmental reviews, and historic preservation. ICF will make staff available immediately upon contract execution to assist in assessing the current procedures and volume and to work with DEP and the EAF Contractors to establish a plan for moving forward quickly (see Tab 1 for further details on start-up). Our start-up team also includes staff to assist in task order process refinement; evaluation of environmental

reviews completed to date; and memorializing policies and procedures. The start-up team includes access to subject matter experts to provide support and technical advice on all aspects of environmental compliance and program management. This mix of staff will allow the ICF Team to continue effective program management while simultaneously evaluating and recommending improvements for implementation.

The key management team members of the 15-day start-up team will work onsite in New Jersey during this phase. The support staff and subject matter experts will be in Trenton as needed and as frequently as requested by DEP. Staff resumes, **expanding on our team's education and experience, are** provided in Tab 6.

Occurring concurrently with the 15-day start-up team, we will also be setting up program management operations, beginning IT activities, evaluating other existing processes, and beginning the placement of the historic preservation staffing augment. This will include three additional management positions including IT/data management, QA/QC, and accounting and reporting.

Beyond the staff listed in Exhibit 2-1, the ICF Team will draw upon the more than 4,500 staff within ICF as well as our teaming partners to satisfy different elements of the program throughout the life of the project,

**EXHIBIT 2-1. ICF AND SUBCONTRACTOR STAFF 15-DAY START-UP TEAM**

Name/Title	Role	Located in New Jersey?	FTE%	Firm
<b>Key Management Staff</b>				
+*Scott Ledford Project Manager	Project Manager	✓	100%	ICF
+*Neil Sullivan Assistant Project Manager	HUD/NEPA Environmental Review Manager	✓	100%	ICF
+*Richard Starzak Assistant Project Manager	Historic Preservation Manager	✓	100%	ICF
*Bob Gawler Assistant Project Manager	IT/Data Management Manager	✓	100%	ICF
*Bon Provenzano Assistant Project Manager	QA/QC Manager	✓	100%	ICF
*Elaine Adams Assistant Project Manager	Accounting and Reporting Manager	✓	100%	ICF
<b>Start-Up Team and Subject Matter Experts</b>				
+*Cathy Dymkoski Program Development Specialist	HUD Policy Expertise	✓	50%	ICF
+*Christine Hartmann Program Development Specialist	Task Order Management	✓	100%	ICF
+*Lizelle Espinosa	Tier II ERRs	✓	100%	ICF



Name/Title	Role	Located in New Jersey?	FTE%	Firm
Program Development Specialist				
+*Ken Rock Program Development Specialist	ERRs, FEMA Expertise	✓	100%	ICF
*Ben Joseph Program Development Specialist	Data Management	✓	50%	ICF
*Elizabeth Tick Program Development Specialist	Application Intake	✓	100%	ICF
*Aleida Johnson Program Development Specialist	Document and Records Retention	✓	100%	ICF
*Kelly Price Program Development Specialist	Training	✓	25%	ICF
*Jessica Feldman Historic Preservation Specialist 1	Architectural History – Staff Augment	✓	100%	ICF
*Monte Kim, PhD Historic Preservation Specialist 2	Architectural History – Staff Augment	✓	100%	ICF
*James Williams Historic Preservation Specialist 2	Architectural History – Staff Augment	✓	100%	ICF
*Douglas Pippin, PhD Historic Preservation Specialist 1	Archaeology – Staff Augment	✓	100%	CPR
*Marie-Lorraine Pipes Historic Preservation Specialist 2	Archaeology – Staff Augment	✓	100%	CPR
*Brenda Lockhart-Springsted Historic Preservation Specialist 2	Archaeology – Staff Augment	✓	100%	CPR
Programmer 1 – Senior Level	IT Support	✓	50%	ICF
Programmer 2 – Junior Level	IT Support	✓	50%	ICF
+Facilities Operations Manager	Office Set-Up	✓	50%	ICF
+Historic Preservation Specialist 1	Environmental Support	✓	100%	ICF
+Historic Preservation Specialist 2	Environmental Support	✓	100%	ICF
Administrative Support Staff/Data Entry	Support	✓	70%	CCN
Subject Matter Experts Program Development Specialist	Environmental Support		100%, when needed	ICF, CPR, AKRF, VHB, Matrix New World

\* 15-Day Start-Up Team (RFQ 3.1.1.3)

\* Key Personnel



### 3. Contract Management

The ICF team will be led by Scott Ledford who has assembled an experienced and talented management team to ensure that the personnel, processes, and tools required for effective support to DEP will be in place. Mr. Ledford is a long time employee of ICF and a senior manager. She has the qualifications and experience to be trusted to lead complex projects across a wide variety of subjects including HUD-funded disaster recovery efforts. Mr. Ledford has previously led the transition of other large projects and understands the activities that need to occur and the risks that need to be managed and mitigated. She brings extensive CDBG and disaster recovery experience, including her recent work for DCA and DEP on **the State's Housing Program Implementation Strategy** contract. Mr. Ledford, along with the other members of our core management team, has experience working on other complex high profile programs, as shown in our project descriptions provided in Tab 7 of this proposal.

#### 3.1 Approach

ICF is a member of **the Project Management Institute's Global Corporate Council**, where we serve at the forefront of

##### Program Management Strength

ICF has employed a program management operation structure on numerous engagements, including Louisiana's CDBG-DR Program. Within this structure, ICF developed and implemented the processes and tools used to manage the largest disaster relief program in U.S. history, enabling the processing of more than 200,000 grant requests and 120,000 cases needing eligibility determination and fund dispersal to homeowners impacted by Hurricanes Katrina and Rita.

management, problem and issue resolution, and other management and supervisory services. Mr. Ledford will be responsible for ensuring a rigorous QA process for all deliverables and services. *Given our capabilities and directly*

designing standards for project management.

Because of our work on complex, dynamic, first-of-a-kind projects, we can offer scalable and agile project management systems.

ICF's program management team will develop priorities for activities across our team; plan workloads; develop a risk management process; and provide change

*related experience, we are ready now to help DEP implement an efficient, effective, and timely program.* Our contract management includes the following key features:

- Select proven professionals for the ICF leadership team. Our leadership team has the experience and expertise to manage a contract of this size, scope and complexity. Each member of our core management team brings the exact experience needed to complete the requirements of the proposed contract with efficiency and best practices. We have created streamlined processes that we can leverage to help DEP accomplish tasks effectively.
- Ensure that ICF staff clearly understands the results that the State of New Jersey seeks. As the Project Manager, Mr. Ledford will be responsible for making sure that everyone on the ICF team focuses **on DEP's key objectives** as reflected in the RFQ. The on-the-ground understanding he brings from his current work on the Housing Program Implementation Strategy provides our team with **in-depth understanding of the State's objectives**.
- Develop a program schedule that will function as an effective tool for managing and monitoring to achieve the desired program results. Based on the insight provided by our experience to date with the State of New Jersey and the work required by the RFQ, ICF has developed a program schedule (Exhibit 3-1) that covers all aspects of program delivery (e.g., start-up, environmental review, historic preservation, IT data management). Our program schedule will serve as a roadmap to ensure that the ICF team, in partnership with DEP, share an **understanding of the program's priorities and direction**. The program schedule will also serve as a valuable stakeholder communication tool. The program schedule will contain specific activities, activity inter-dependencies, and key milestones and deadlines. This information will enable the identification of critical path activities as well as schedule risks that may affect the program schedule and performance. As part of our management process, we will periodically review the program schedule comparing the **planned activities' start and finish to actual**, identify any variance in the plan, and reasons for the variance, and implement appropriate corrective actions.
- Establish and maintain effective communication. Our core management team members all recognize the importance of communication with the State Contract Manager and other DEP personnel, agencies, and EAF contractors. To facilitate internal ICF Team communication, Mr. Ledford will conduct regular meetings with his



management team. In addition, he will schedule and hold regular meetings with the State Contract Manager and designated DEP staff members to discuss contract program schedule and performance. During startup, Mr. **Ledford will conduct a daily “stand-up” meeting of the management team** to address progress, schedule status, problem/issue management, risk management, and near-term priorities. Additional meetings will also be held to address specific issues in more depth, as needed.

- Implement continuous improvement. We will actively pursue opportunities for process improvement and efficiencies. To ensure continuous improvement, we will build a performance assessment component into our internal business processes to identify opportunities to improve efficiency throughout the period of performance
- Assess and communicate results. ICF will work with DEP to develop program reporting formats that will provide DEP with information on progress at defined intervals. The content and format of these reports may change over time

as DEP’s needs evolve.

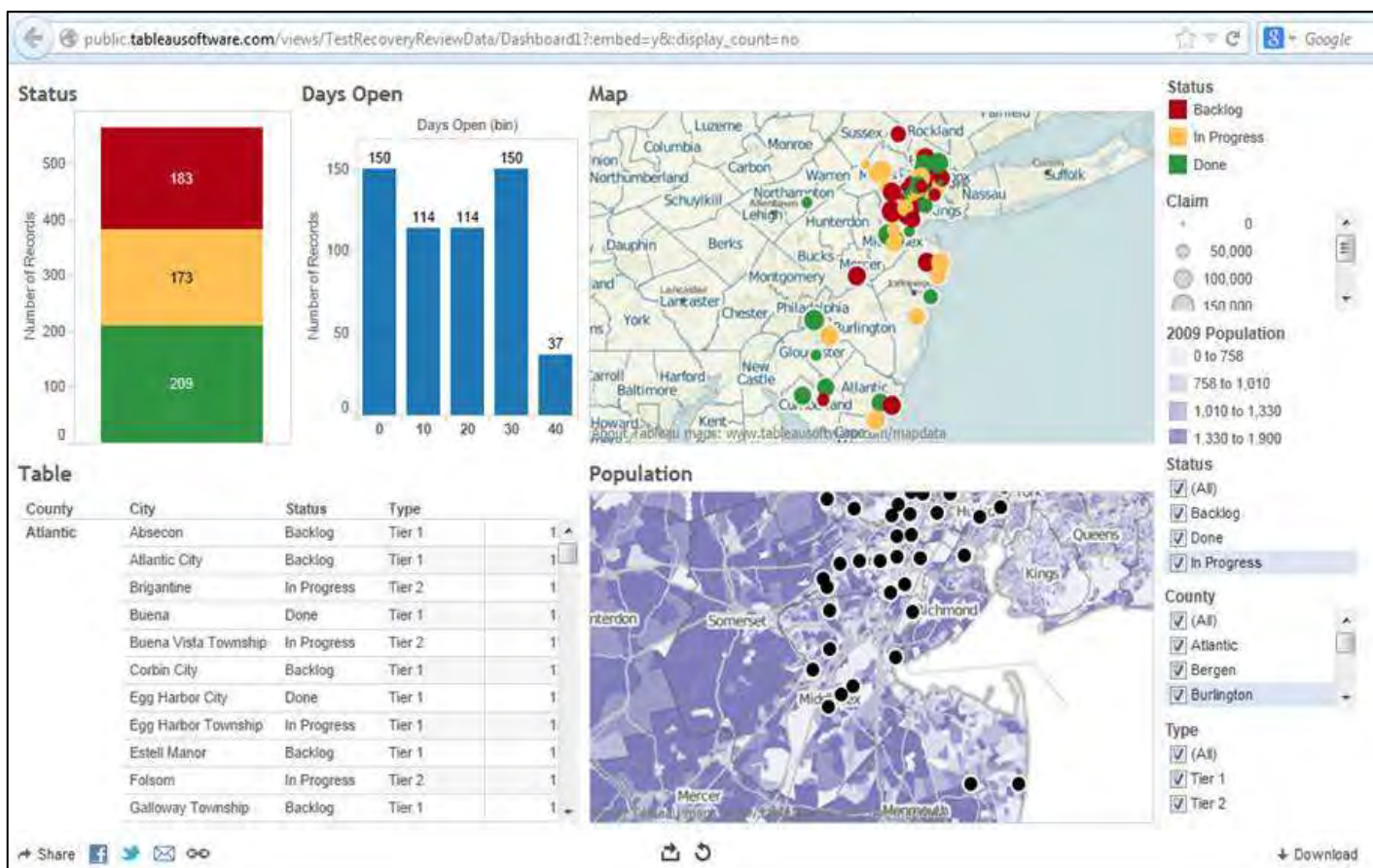
### 3.1.1 Work Flows

ICF’s proposed work flows for each core service are presented in Tab 1, along with a description of the business processes and procedures to be put in place, identified management and operating plans and procedures, and work flow management diagrams. To *provide ICF and DEP with insight into the effectiveness and efficiency of the program, ICF will create a Web-based dashboard* using Tableau with up to seven charts/maps to highlight important metrics of the program. The dashboard will clearly illustrate the review progress, financial information, and property locations (Exhibit 3-2). ICF will provide access to five licenses.

### 3.1.2 Program Team Quality Control

Our management team will be responsible for ensuring the delivery of high-quality services and products that fully meet

**EXHIBIT 3-2. EXAMPLE OF DASHBOARD CAPABILITIES**





all objectives, contract requirements, and standards. In addition, our management team will promote continuous improvement across the team as a way to maintain quality. Section 1.8 *Project Quality Assurance and Oversight* (Tab 1) details the scope of our QA/QC plan for the full lifecycle of the program.

## QUALITY CONTROL FOR IT DEVELOPMENT

ICF employs software development and management processes that comply with the Capability Maturity Model® Integration (CMMI®). CMMI is a global standard for industry best practices for project management, software and systems engineering, and program support. To date, ICF software development projects have been assessed as CMMI Level 3, an accomplishment that recognizes the high level of process **maturity being implemented by ICF. ICF's IT teams have** complied with CMM (precursor to CMMI) and CMMI best practices since May 2002, and our most recent CMMI Level 3 organizational process maturity reassessment was conducted in February 2013. Over this timeframe, each of our process maturity milestones was validated via the execution of formal SCAMPI A appraisal led by an independent (third-party) Lead Appraiser.

### 3.1.3 Problem Identification and Resolution

At ICF, we tell our managers that we want to hear good news quickly and bad news even faster so that problems can be resolved rapidly. Early identification of problems and clear mechanics for escalation are critical so that problems have the smallest impact on budget, schedule, and quality. Proactive management, monitoring, communication, and coordination are the keys to early identification. Our plan for early identification of problems includes the following activities:

- Proactive management—The quality and experience of our senior team is the first line of defense against problems. Our management team has strong management and technical skills as well as specific experience in housing programs and disaster recovery. We have experienced and solved most, if not all, of the problems that can occur in a program of this nature. This experience allows us to spot potential problems early, implement controls to avoid many problems, and where necessary implement solutions before a problem reaches crisis point.
- Monitoring and communication—As noted above, we will maintain a regular internal reporting schedule with the

State Contract Manager and other designated DEP staff members to provide information on progress and expected results. At these meetings, we will openly discuss potential problems and offer solutions.

- Quality monitoring—As referenced above, ICF's robust QA/QC process is described in Section 1.8 *Project Quality Assurance and Oversight* in Tab 1.
- Coordination with other contractors—Designated members of our management team will communicate regularly with EAF Contractors to monitor schedule and performance and with ICF subcontractors to ensure communication and quality.
- Problem escalation—When potential problems are identified, Mr. Ledford and the other members of the management team—in conjunction with the subcontractor leads as needed—will assess the situation to formulate and implement solutions. If any issue is expected to have an unavoidable impact on a work product, budget or schedule, Mr. Ledford will immediately notify the State Contract Manager and other DEP staff members as designated. These discussions will include a description of the difficulty, the extent of the impact anticipated, the actions required to correct or minimize the impact, and options for additional actions. Mr. Ledford will use the information provided by the State Contract **Manager to select the course of action that best suits DEP's** needs and priorities.

### 3.1.4 Management Tools

ICF's administrative and technical reporting systems support cost-related risk management for DEP and ICF. Our cost control approach allows managers to track labor hours in **near real time. ICF's timekeeping program will allow our** managers to analyze compliance with the defined scope of services offered in this proposal under Cost Quotation Price Schedule 1, Lines 1-5. Our tools are flexible and will be tailored to the needs of this contract. ICF staff members are thoroughly familiar with these tools and participate in training sessions on new and successfully implemented tools **for contract administration. ICF's management tools include** the following:

- WebET. All ICF employees are required to record their hours spent on each task order on a daily basis using a unique project code. Hours are entered electronically online via our WebET timesheet from work, home, or elsewhere. Daily audits are conducted to assure deadline



compliance, and all employees are required to complete annual training in proper timekeeping procedures.

- **Costpoint.** ICF uses this Federal Government-approved accounting system to manage budgets and costs. Costpoint can be configured to track costs at many levels, including contract, task order, subtask, and specific activities or assignments below the subtask level. Managers use Costpoint to monitor actual cost against budgets, track hours charged by individuals, and monitor subcontractor costs and other charges. Routine reports can be run weekly and monthly, and custom reports can be run daily if needed. Invoices are produced directly out of Costpoint and provide transparent backup to all charges against each task order. With Costpoint, we will be able to track specific CDBG projects.
- **MS/SharePoint Portal.** A Web-based communication and collaboration tool, SharePoint facilitates establishing a system of record for program information, including policy and program design, current Sit-Rep information, and data calls. SharePoint can also be a useful tool for meeting the requirements of auditors who need access to authoritative data.

### 3.1.5 Communication with State Contract Manager

Effective communication between and among project and state staff is critical to achieving success. For the team to perform effectively, information will need to be shared regularly to keep the lines of communication open, address challenges, complete the activities, and ensure the program is performing in a coordinated fashion.

To achieve these objectives, Mr. Ledford and the management team will conduct regular conference calls with the State Contract Manager to obtain direction and guidance on all assignments and preferred formats for communication (e.g., email, phone calls, reports). Through our project management structure, we will submit regularly scheduled progress reports to ensure ongoing compliance with contractual requirements. Mr. Ledford and the core managers will also conduct periodic in-person meetings with the State Contract Manager to monitor satisfaction with the contract performance. See Exhibit 3-2.

Subject to revision based on DEP input, ICF proposes the following (Exhibit 3-3) as the basis for a preliminary communications plan in collaboration with DEP. Please see Section 1.7 *Interfacing with NJDEP or State* (Tab 1), for additional details on our communications plan.

**EXHIBIT 3-3. PROPOSED COMMUNICATION PLAN ELEMENTS**

Communication	Designated ICF Staff	Recommended Frequency
Conference call with State Contract Manager and designated DCA staff	Project Manager/management team	Weekly
In-person status meeting with State Contract Manager and designated DCA staff	Project Manager/relevant members of management team	As needed/directed
In-person and/or conference call meetings with cooperating agencies	Project Manager/relevant members of management team	As needed/directed
Email/telephone with State Contract Manager and designated DCA staff	Project Manager/management team	As needed/directed
Specific Progress/Status Reports, including cost controls to State Contract Manager	Project Manager/management team	Weekly and monthly
Issue Tracking and Identifying Fraud, Waste, and Abuse	Project Manager/management team	As needed/directed



EXHIBIT 3-3. PROGRAM SCHEDULE

Task Activities	Year 1												Year 2												Year 3											
	M1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36
<b>Core Program Management Operations</b>																																				
Start-up (See Exhibit 1-4)																																				
<b>Core Program Management Operations</b>																																				
Facilitate Business Flow Process Discussions - DEP, NJEIT, DCA, or Sub-recipients																																				
Evaluate/Determine Environmental Review Levels and Articulate Requirements																																				
Ensure Application Completeness																																				
Recommend EAF Contractor Process Improvement																																				
Implement Process Improvement Recommendations																																				
Support/Participate in Interagency Meetings including SHPO/EAF Contractors																																				
Verify EAF Contractor Invoice Accuracy																																				
Create Projected Budget/Cash Flow for DEP Administration																																				
Develop Communications Plan																																				
<b>IT</b>																																				
Order, Enable, and Initially Configure O365 Environment																																				
Augment Critical ERMS Features and Implement High Priority Workflows																																				
Train Key System Users																																				
Generate Export Format for ERMS Data Transfer																																				
Prioritize Needs for Further Augmentation																																				
Perform Further System Augmentation																																				
<b>Environmental Reviews</b>																																				
Generate/Manage Task Orders																																				
Weekly Mtgs/Status/Monitoring Reports with EAF Contractors, State Contract Manager, DEP																																				
Manage Application Intake/QA/Completeness																																				
Determine Environmental Review Levels																																				
Determine if Prior Agency Environmental Clearance																																				
Review Prior Applicant/Developer Environmental Document - Determine Additional Assessment and Task Out																																				



EXHIBIT 3-3. PROGRAM SCHEDULE

Task Activities	Year 1												Year 2												Year 3											
	M1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36
Develop Combined Statutory Checklist, As Necessary - for Other Agency Match	[Solid Blue Bar]												[Dashed Blue Bar]												[Dashed Blue Bar]											
Verify Completeness and Quality and Conduct Reviews of Environmental Documents and ERR	[Solid Blue Bar]																																			
Recommend DEP Environmental Review Policies and Document, if Directed	[Dashed Blue Bar]																																			
Develop Clearance Documents for Approvals and Verify Document Management	[Solid Blue Bar]																																			
Manage Public Notices and Completion of ERR	[Solid Blue Bar]																																			
Coordinate RROF for DCA Signature	[Solid Blue Bar]																																			
Confirm Compliance with FEMA Requirements, As Needed	[Solid Blue Bar]																																			
Review EAF Contractor Performance for Retainage Release	[Solid Blue Bar]																																			
<b>Staff Augmentation</b>	[Solid Blue Bar]																																			
<b>State Historic Preservation Office</b>	[Solid Blue Bar]																																			
Verify Completeness and Quality of Eligibility Determination	[Solid Blue Bar]																																			
Assess Effects for Eligible Properties	[Solid Blue Bar]																																			
Consult with SHPO and Consulting Parties	[Solid Blue Bar]																																			
Resolve Adverse Effects	[Solid Blue Bar]																																			
Review Compliance with NJRHPA	[Solid Blue Bar]																																			
Draft Section 106 Comments for SHPO Signature	[Solid Blue Bar]																																			
<b>Interfacing with NJDEP or State</b>	[Solid Blue Bar]																																			
<b>Training of Staff</b>	[Solid Blue Bar]																																			
Develop Training Plan	[Solid Blue Bar]			[Dashed Blue Bar]																																
IT System Training ICF Team, DEP, EAF Contractors, others (TO)	[Dashed Blue Bar]																																			
ERR Protocols Training to DEP and EAF Contractors (TO)	[Dashed Blue Bar]																																			
<b>Project QA and Oversight</b>	[Solid Blue Bar]																																			
<b>Quality Assurance/Quality Control</b>	[Solid Blue Bar]																																			
Develop QA/QC Methodology	[Solid Blue Bar]			[Dashed Blue Bar]																																
Develop Standard Checklist for ERRs	[Solid Blue Bar]			[Dashed Blue Bar]																																
Perform Routine Quality Checks of ERRs	[Solid Blue Bar]																																			
Report Quality Check Results	[Solid Blue Bar]																																			
Document Internal Operations	[Solid Blue Bar]			[Dashed Blue Bar]																																
Develop Operational Processes for EAF Contractors	[Solid Blue Bar]			[Dashed Blue Bar]																																





## 4. Potential Challenges

People who lost their homes and businesses months ago have understandably high expectations for getting assistance for disaster recovery—they want it fast and likely want more than the program can afford to provide. Accompanying that assistance are complex rules for environmental review, historic preservation studies, compliance with building codes and elevation rules, and other requirements that present challenges. Homeowners who are living in hotels or small business owners who cannot open their doors to customers are likely to have limited patience for environmental review processes and procedures. Providing CDBG assistance correctly and providing it fast will be in dynamic tension, presenting challenges throughout the implementation of the recovery program.

*The ICF Team, through our current contract in New Jersey, has already begun to work through a number of issues and offer solutions.* For example, ICF assisted DCA in developing its new Action Plan that covers the second round of CDBG-DR funding. This new Action Plan contains programs that require environmental reviews, and there will inevitably be political pressure to conduct the reviews quickly and accurately. With environmental reviews currently being conducted for the first Action Plan and the pending workload associated with the second Action Plan, the main challenge is to drive consistency and capacity in the preparation of the ERRs. The

success of the Action Plan programs cannot be delayed by the environmental process, so it is important to develop the capacity and processes needed to prepare the volume of environmental reviews needed to meet program goals.

In addition, based on our experience in helping other communities recover from disasters, we can anticipate upcoming challenges and draw on our experience to recommend solutions. The availability of a large and diverse environmental team that can handle multiple tasks across a wide range of issues is critical **to our team's ability to respond** to the inevitable challenge of delivering assistance to affected property owners and tenants. Our expert team allows us to jump in as challenges occur, thus assuring that small issues do not become big problems. Further, our experience working in similar projects for other clients allows us to anticipate likely challenges and mitigate them.

ICF uses a proven process for dealing quickly and effectively with problems. Our process includes raising issues at daily project stand-up meetings, assigning action items and resolution deadlines, preparing recommended responses, presenting alternative solutions to clients, documenting the decisions to create an audit trail, training and updating our staff members, and communicating the decisions to stakeholders.

Exhibit 4-1 identifies examples of the challenges we anticipate and possible measures to mitigate the challenges.

**EXHIBIT 4-1. STRATEGIES FOR ADDRESSING POTENTIAL CHALLENGES**

Challenges	Solutions
Conduct a high volume of environmental reviews in a compressed period to meet program goals.	<ul style="list-style-type: none"> <li>Offer incentives to motivate EAF contractors to prepare ERRs quickly.</li> <li>Focus on “easy” ERRs first to obtain volume.</li> <li>Assign the “difficult” ERRs to a separate team to tackle the complex issues.</li> <li>Closely monitor EAF contractors to determine who is performing and who is not, and reassign cases to balance workload.</li> </ul>
Missing information clogging environmental review process.	<ul style="list-style-type: none"> <li>Coordinate with application intake case workers to reach applicants and obtain the information.</li> <li>Triage cases with complete and incomplete information to fast track applications that are complete.</li> <li>Provide outreach to applicants to advise them on information needed for reviews.</li> <li>Work with DCA's IT contractor to establish improved data feeds from SBA, FEMA, insurers, and others who feed information into the data warehouse.</li> </ul>
Data analysis and reporting indicates that some EAF contractors are working outside of established norms—too many cases per day, too few cases per day, and inconsistent reviews compared to others in the same vicinity.	<ul style="list-style-type: none"> <li>Conduct QA review of files.</li> <li>Assign supervisor to work in tandem with reviewers to validate the process.</li> <li>Alert forensic auditors.</li> </ul>
Priority applicants—for example, low income, elderly, and special needs—are	<ul style="list-style-type: none"> <li>Establish special review team.</li> <li>Screen files for priority applicants, and send to special team for processing.</li> </ul>



## EXHIBIT 4-1. STRATEGIES FOR ADDRESSING POTENTIAL CHALLENGES

Challenges	Solutions
not being processed quickly enough to meet state's priorities.	
Data sources required for some reviews, such as information about local historic properties or contaminated sites, are not available online or in readily accessible databases.	<ul style="list-style-type: none"> <li>▪ Work with local planning departments to identify local data and information not available in standard databases.</li> <li>▪ Reach out to local agencies and nonprofit organizations to gather information.</li> </ul>
Applicants complain about environmental findings, but complaints suggest a lack of understanding of the issues.	<ul style="list-style-type: none"> <li>▪ Ramp up outreach and education program to explain process and requirements.</li> <li>▪ Assign staff members to work with neighborhood-based organizations, nonprofit housing and development organizations, and others to explain requirements</li> </ul>
Media providing negative stories about the progress of environmental reviews or findings.	<ul style="list-style-type: none"> <li>▪ Develop talking points for state program personnel and Governor's communication team.</li> <li>▪ Prepare fact sheets for media outlets.</li> <li>▪ Develop progress reports and "success stories" for media release.</li> </ul>
Original policies and procedures may change—for example, HUD or FEMA may issue new guidance on environmental reviews.	<ul style="list-style-type: none"> <li>▪ Establish a change-control process to include contractor and NJ program staff to consider options and their costs and risks.</li> <li>▪ Maintain a policies and procedures tracking system.</li> <li>▪ Communicate changes to stakeholders.</li> </ul>
Aspects of the environmental reviews causing unnecessary delays due to HUD requirements.	<ul style="list-style-type: none"> <li>▪ Where appropriate, approach HUD with a request for a waiver of certain requirements.</li> <li>▪ Provide evidence of a lack of environmental effect and a credible reason for the waiver.</li> </ul>
Elected officials are interceding on behalf of constituents who have complaints or who are looking for preferential assistance.	<ul style="list-style-type: none"> <li>▪ Establish a "constituent services" functionality to address specific concerns.</li> <li>▪ Establish a workflow process whereby specific issues get elevated to the correct manager.</li> <li>▪ Prepare clear policies laying out program process and expectations for elected officials.</li> </ul>
Data used for reporting progress to outside stakeholders about the conduct of environmental reviews are inconsistent, incomplete, or not reported properly, creating confusion among stakeholders and in media.	<ul style="list-style-type: none"> <li>▪ Establish a reliable QA/QC process for data.</li> <li>▪ Use standardized metrics to create a single daily report that is shared with all stakeholders so that everyone has same baseline for talking about the progress of program.</li> <li>▪ Develop talking points for state program staff members and the Governor's communication team.</li> <li>▪ Prepare fact sheets for media outlets.</li> </ul>



## 5. Organizational Support and Experience

In this section, we provide an overview of the ICF organization, our personnel, and **the team's** experience in environmental compliance, CDBG and disaster recovery programs, IT systems, and program management. While ICF offers all expertise in-house, we have partnered with local New Jersey subcontractors for their valuable pertinent experience, as shown on the following pages.

### 5.1 Organization

ICF has been providing community development support for more than 40 years, and support on environmental policy for more than 30 years. Founded in 1969 as the Inner City Fund, **ICF is one of the nation's leading consultants in addressing** critical issues such as disaster preparedness and recovery, environment and cultural resources, housing, workforce and community development, education, public health, transportation, and energy efficiency. Our clients include government, nonprofit organizations, and commercial client organizations. We now have more than 4,500 employees in over 60 offices worldwide. Our firm views housing and economic development, disaster recovery, and protecting the environment as combined elements necessary to building the kind of communities where we want to live.

ICF has been at the forefront of providing advisory services to partner with our clients to solve complex problems and produce mission-critical results. Across our markets, we provide end-to-end services that deliver value throughout the entire life of a policy, program, project, or initiative.

**Advisory Services.** We help our clients analyze the policy, regulatory, technology, and other challenges facing them and we develop strategies and plans for responding. Our advisory and management consulting services include needs and market assessments, policy analysis, strategy and concept development, change management strategy, enterprise architecture, and program design.

**Implementation Services.** We implement and manage technological, organizational, and management solutions for our clients, often based on the results of our advisory services. Our implementation services include IT solutions, project and program management, project delivery, strategic communications, and training.

**Evaluation and Improvement Services.** In support of advisory and implementation services, we provide evaluation and improvement services to help our clients increase the future efficiency and effectiveness of their programs. These services include program evaluation, continuous improvement initiatives, performance management, benchmarking, and return-on-investment analyses.

For this program, we offer DEP an integrated team that brings expertise in policy making, management, review, and implementation of environmental compliance following regulations from NEPA, HUD, and FEMA. Further, our team is well versed in CDBG Disaster Recovery initiatives, IT development, and program management.

### 5.2 Personnel

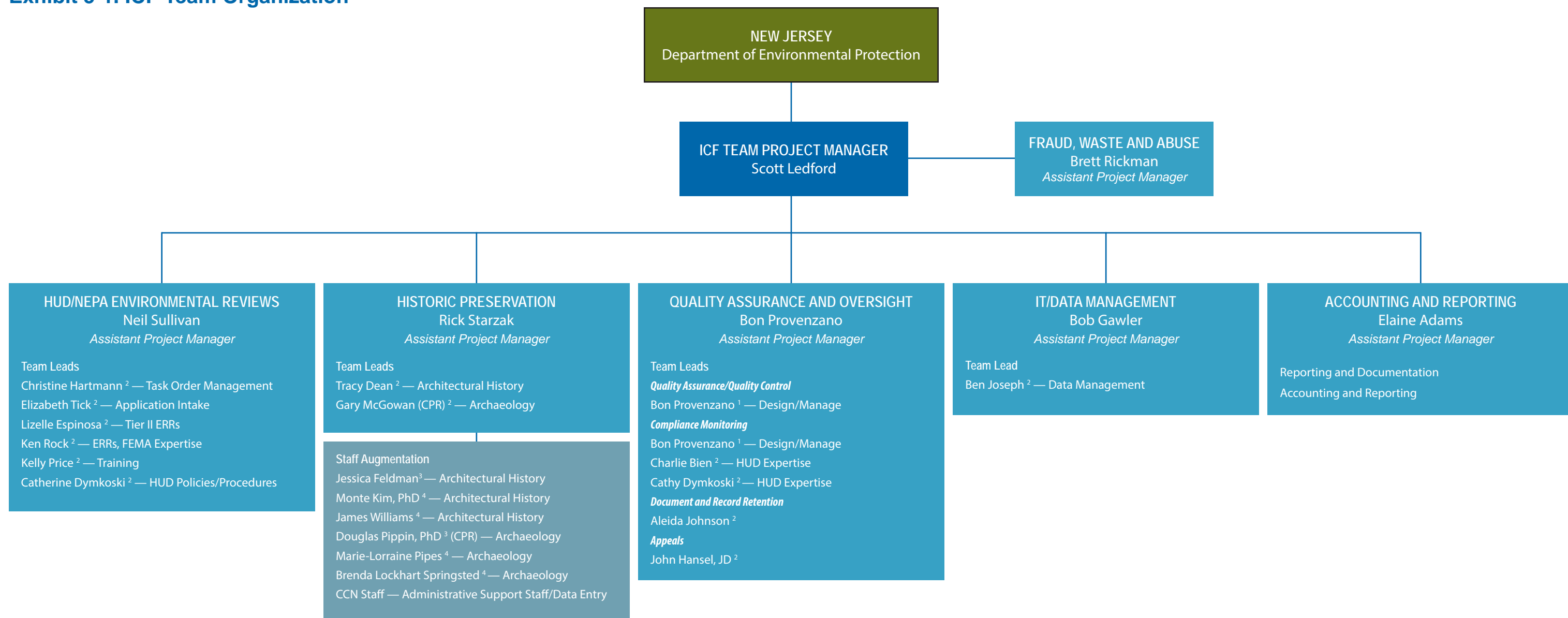
The personnel we propose for this contract include our project manager, Scott Ledford, a core team of managers and supervisory staff to support him, key personnel, and subject matter experts. In addition to our core team, ICF employs more than 4,500 professionals to which Mr. Ledford has access as needed. Our local subcontractors will also provide additional resources for this program.

On the following page, we provide an Organizational Chart (Exhibit 5-1) that includes staff roles and labor titles. All key personnel will be providing direct service to DEP under this contract.





## Exhibit 5-1. ICF Team Organization



### SUBJECT MATTER EXPERTS

- HUD/CDBG — Dolores Acurso <sup>2</sup>
- FEMA — Tracy Dean <sup>2</sup>
- Archaeology — Carol Weed <sup>2</sup> (VHB)
- Architectural History — Colleen Davis <sup>2</sup>
- Floodplains — Alexa La Plante <sup>2</sup>
- Wetlands and Water Resources — Brian Hobbs <sup>2</sup> (Matrix New World)
- Coastal Zone Management — Neville Reynolds <sup>2</sup> (VHB)
- Sole Source Aquifers — Brian Zieroff <sup>2</sup> (AKRF) Biology/T&E Species — Dave Johnson <sup>2</sup>
- Wild & Scenic Rivers — Shandor Szalay <sup>2</sup> (AKRF)
- Air Quality — Tom Wholley <sup>2</sup> (VHB)
- Farmland Protection Policy Act — Gary Rickle <sup>2</sup> (AKRF)
- Environmental Justice — Shilpa Trisal <sup>2</sup>
- Noise Abatement & Control — David Coate <sup>2</sup>
- Toxic Chemicals/Hazardous Materials/Contaminated Sites — Jim Rice <sup>2</sup>
- Phase I & II ESA Lead Reviewer — Thomas DeMichele, LSRP <sup>2</sup> (Matrix New World)
- Hazardous Operations/Above Ground Storage Tanks — Robert Lanza <sup>2</sup>
- Airports — Peter Byrne <sup>2</sup> (VHB)
- Land Use/Planning — Graham Trelstad <sup>2</sup> (AKRF)
- Socioeconomics — Alex Uriarte <sup>2</sup>
- Transportation — Tom Phelan <sup>2</sup> (traffic), Lisa DiTaranti <sup>2</sup> (transit) (VHB)
- GIS — Dan Moreno <sup>2</sup>
- Community Outreach — Susan O'Donnell <sup>2</sup> (VHB)

**Labor Titles**

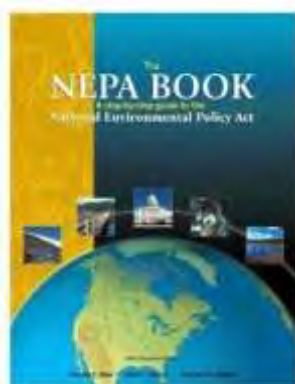
<sup>1</sup> Assistant Project Manager      <sup>3</sup> Historic Preservation Specialist 1  
<sup>2</sup> Program Development Specialist    <sup>4</sup> Historic Preservation Specialist 2

## 5.3 Experience

ICF has served clients for more than three decades in the areas of environmental compliance, CDBG and disaster recovery, program management, IT systems, and other fields related to the implementation of lifecycle program support. We provide a brief overview here of our experience in each of these areas, followed by an ICF project example (including client references) for each expertise. Where applicable, we **provide an example of our subcontractors' project** experience. Tabs 7 and 8 provide additional experience at length.

### 5.3.1 Environmental Compliance

For more than 40 years, ICF has been helping clients implement the requirements of NEPA and related laws. We have teams across the country preparing and reviewing ERR documentation in accordance with HUD regulations, including 24 CFR Part 58 and Part 55 requirements. **ICF's** experience enables us to streamline the NEPA process to accommodate aggressive and challenging schedules. Our firm has prepared more than 5,000 NEPA and other environmental regulation documents for a range of projects and clients.



**ICF's NEPA experience and qualifications provide credibility and a demonstrated ability to produce defensible NEPA processes and products.**

ICF environmental specialists **literally "wrote the book"** for NEPA compliance (*The NEPA Book: A Step-By-Step Guide on How to Comply With the National Environmental Policy Act*). Our state and Federal clients turn to ICF to deliver training on such topics. Our NEPA experience and qualifications provide credibility and a demonstrated ability to produce defensible NEPA processes and products. Given this level of involvement and experience with NEPA regulations, we offer sound management and reliable best practices that will keep the team on target with compliance tasks under the proposed contract.

## PROJECT EXAMPLE: CALIFORNIA WEATHERIZATION ASSISTANCE PROGRAM

ICF, as the consultant for Section 106 of the NHPA, is assisting the California Department of General Services and the Department of Community Services and Development (CSD) in the implementation of the First Amended PA among the California Energy Commission, CSD, and the California SHPO regarding Section 106 Compliance for Department of Energy ARRA Programs. CSD administers Federal programs to assist low-income families across the entire State of California to increase the energy efficiency of their homes. Relevant to **DEP's contract** needs, we provided qualified architectural historians to assist the California SHPO to conduct Section 106 reviews. Working with SHPO early on, ICF creatively streamlined the original methodology described in the PA for different aspects of the program, crafted templates for multiple applicant groups for consistency, and developed a highly efficient database and research and tracking tools to process the high volume rapidly, therefore ensuring timely release of Federal funding.

ICF crafted templates for multiple applicant groups for consistency, and developed a highly efficient database and research and tracking tools to process the high volume rapidly, therefore ensuring timely release of Federal funding. **In the first 18 months, ICF's** architectural historians reviewed more than 10,000 residential units under the terms of the PA. We worked effectively with SHPO staff to streamline the Section 106 reviews so that approvals are received within **2 business days of ICF's receipt of an application** to facilitate ARRA funding. ICF staff made such a great impression with the client and SHPO that we have been encouraged to work on this effort with minimal oversight. As a result, from 2012 to 2015, **ICF's role was expanded to conduct Section 106** reviews for projects funded by both the Department of Energy and the Department of Health and Human Services.

*Our solid foundation of Section 106 understanding, and the effective system we designed to streamline the review process, can be applied to help simplify and expedite the **Section 106 process for New Jersey's CDBG-DR Grant Program.***

**CLIENT CONTACT:** Valerie Namba, Senior Environmental Planner, California Dept. of General Services, (916) 376-1607, Valerie.Namba@dgs.gov



## AKRF PROJECT EXAMPLE: NJ TRANSIT ENVIRONMENTAL ON-CALL, HURRICANE SANDY RECOVERY AND RESILIENCY

As a subcontractor, AKRF is providing environmental consulting services to New Jersey Transit through a 3-year on-call contract. AKRF's role includes NEPA environmental reviews, cultural resources support, and Section 106 compliance and coordination. The first task order is focused on supporting NJ Transit with its post-Sandy repair, recovery, and resiliency efforts. AKRF's most recent assignment involves an archaeological sensitivity assessment for the area along the Gladstone Branch, which sustained serious damage during Hurricane Sandy. As part of this analysis, AKRF's archaeologists coordinated with the New Jersey SHPO and NJ Transit to develop an efficient streamlined approach to analyzing the archaeological potential of the project site in accordance with Section 106 of the NHPA. The approach sought to replace the typically required full Phase IA archaeological documentary study with a more condensed assessment that accomplished an equivalent level of analysis in a compressed time period. AKRF's archaeologists and mapping specialists worked closely to create a GIS map that superimposed information relevant to the archaeological assessment, such as historic maps, soil boring data, and topographical mapping on a base map of the railroad corridor. Archaeologists used these data to characterize the archaeological sensitivity of the approximately 22-mile-long area of potential effect for the project. The results of the study were presented in a letter to the SHPO. The SHPO found that the analysis was sufficient and that no further archaeological study was necessary. The *SHPO gave approval for the project to proceed within weeks of AKRF's involvement.*

**CLIENT CONTACT:** Dara Callender, Supervising Compliance Specialist Environmental Services Unit, NJ Transit, 97391-7205, [dcallender@njtransit.com](mailto:dcallender@njtransit.com)

### 5.3.2 CDBG and Disaster Recovery Programs

ICF provides training, technical assistance, and policy guidance on CDBG, state CDBG, and CDBG-DR programs. Currently, we serve the State of New Jersey as DCA's Housing Program Strategy Advisor where we are helping DCA develop the process for using CDBG-DR funds. We were named to serve New Jersey in this critical capacity due in part to our previous experience on the Louisiana CDBG-DR Program (see details on this program below). In addition, each year for the past 13 years, ICF has designed and delivered annual training

workshops for state recipients and administrators on the implementation of CDBG-funded projects and special topics. In 2011, we developed and delivered a 2-day hands-on course on how to conduct environmental reviews including how to determine the appropriate level of review, how to do the review, where to find resources and appropriate documentation (including Web resources). We also provide training and updated tools annually to state grant administrators to prepare Part 58 environmental reviews. Recently we helped the State of Connecticut implement their CDBG-DR programs by designing a streamlined system enabling us to review more than 1,000 applications within three months with an average acceptance rate of 95%. Further, within 30 days, ICF conducted extensive outreach to potential eligible applicants of Connecticut's CDBG-DR funds, including outbound calls and a mass mailing and email campaign. *We are involved with CDBG and disaster recovery programs on-the-ground and at the policy level, offering DEP a range of techniques to help expedite your environmental review processes while meeting all regulations.*

## PROJECT EXAMPLE: THE LOUISIANA CDBG-DR PROGRAM

From 2006 to 2009, ICF supported one of the largest disaster relief programs in U.S. history, the Federally funded Hurricane Katrina disaster response program. At the project's peak, ICF led a team of 2,300 contracting staff working under the direction of the State of Louisiana to revise disaster recovery action plans and implement procedures consistent with state policy and CDBG-DR homeowner and rental property programs. A first-of-its-kind program in terms of size, swiftness, and mission, ICF created a start-to-finish case management system to handle 188,000 grant requests and more than 120,000 cases needing eligibility determination and fund dispersal. Our staff, under contract to the state's CDBG-DR program, interacted with the program staff, local governments, legislators, HUD, SBA, insurers, EPA, FEMA, lenders and others to work through the large legal, legislative, and regulatory issues affecting the program and to handle more than 170 state initiated program design changes. *Our team developed procedures to ensure compliance with CDBG program requirements and those of other Federal programs to preclude duplication of benefits.*

**CLIENT CONTACT:** Ellen M. Lee, State of Louisiana, (504) 598-4663, [ellen@gnof.org](mailto:ellen@gnof.org)



## AKRF PROJECT EXAMPLE: NY RISING COMMUNITY RECONSTRUCTION PLANS

The critical role of safe, resilient, and sustainable communities was dramatically demonstrated when Superstorm Sandy hit New York State in 2012, causing billions of dollars in damage and resulting in unprecedented disruption to our economy and way of life. Sandy, Irene, and Lee are painful reminders of not only our vulnerabilities, but also the interrelationships between natural disasters, and the physical, social, and economic health of our communities. *AKRF has taken an active role in trying to make a difference in helping the city and communities throughout the state repair, restore, and prepare for the future.*

AKRF is leading a multi-consultant project team as part of the New York Rising Community (NYRC) initiatives to prepare Reconstruction and Resiliency Plans for several communities throughout New York State that were damaged by these storms, as well as plans to deal with future natural disasters. The NYRC Plans are comprehensive documents that identify projects for reconstruction, how to build back better, and how to minimize future risks to community assets from extreme weather events. The NYRC Plans serve as the principle planning documents for communities to use for implementation funds. AKRF has worked closely with local communities to develop comprehensive and implementable plans **integrate the communities' future and priorities, set the stage for stronger and more resilient communities in the face of increased risk of major storms, follow Federal guidelines and national objectives in identifying projects, and incorporate global best practices in disaster response, economic development, and manmade and natural infrastructure resilience.** Key components of the NYRC Plans include: assessment of risks to key assets and systems; plans to restore and increase resilience of key assets; projects with economic growth co-benefits; protection of vulnerable populations; regional coordination; detailed implementation approach; commitment to innovative design; commitment to inclusive public engagement; and commitment to local capacity-building and transferability.

**CLIENT CONTACT:** William Harding, NYS Department of State, Division of Local Government, 914-734-1347, wharding@dos.state.ny.gov

### 5.3.3 Experience in IT Systems

ICF has a division of IT experts dedicated to integrating and building systems for environment and energy efficiency programs. **The IT team's experiences includes integrating 20** different systems for U.S. Citizenship and Immigration

Services (to detect fraud and identify national security threats); integrating data from 20 sources to build a model that tracks the impact of sea-level rise on U.S. coastlines and transportation infrastructure (for National Oceanic and Atmospheric Administration, the Intergovernmental Panel on Climate Change, and others); as well as developing new IT systems specific to program and client needs. For example, as part of our Louisiana CDBG Disaster Recovery Program **contract, ICF's IT staff built a case management system that handled 188,000 grant requests.** We are well versed in creating systems that receive and manage submission of complex documents, as well as tools that track grant funding patterns, execute fraud detection algorithms, forecast program participation, and model economic and environmental impacts of a wide range of policies.

We are technology-agnostic, meaning we do not promote any specific technology software solutions. Instead, we work with clients to understand their needs, and often to understand what they currently use, and then we make recommendations.

## PROJECT EXAMPLE: E-FILING FOR THE FEDERAL TRADE COMMISSION

To help enforce U.S. antitrust and consumer protection laws, the Federal Trade Commission (FTC) issues administrative complaints under 16 CFR Part 3 when it believes companies are committing unfair or deceptive acts in the marketplace. Each FTC complaint kicks off a proceeding under which numerous legal filings may be submitted from interested parties over months or possibly years. This process was almost entirely paper-based and, as a result, inefficient for FTC staff, burdensome to filers, and limited in terms of public access to submitted materials. As a result, the FTC needed a contractor to develop a **Web-based "E-Filing System" in** which: (1) relevant counsel could submit filings electronically through Web-based collection forms; and (2) FTC staff could receive, review, track, sort, and process filings for each proceeding through real-time access to an intuitive, Web-based back office tool.

Leveraging our existing CommentWorks software framework, *ICF worked closely with FTC to move through the software development lifecycle—through requirements refinement and validation, system design, software development and testing, and user acceptance and training.* The system includes administrative functions such as user account management and proceeding setup, ingress tools in which filings can be submitted via Web forms or entered into the system by FTC staff, document processing tools for automatically creating 508-compliant, text-layered PDFs of





each filing, Web posting tools to generate exports of filings and related indices in a format suitable for posting to an **electronic “reading room’ on the FTC’s Web site, and other document processing functions.**

**CLIENT CONTACT:** Mr. Ledford Wood, Contracting Officer’s Technical Representative, (202) 326-2056, dwood@ftc.gov

### 5.3.4 Program Management

The following pages describe our experience in specific functional areas that will help ICF serve DEP. We integrate our services using formal program management procedures that ensure we provide a disciplined, well organized process with measurable goals and milestones. Our approach has helped **us design and implement some of our nation’s most complex projects.** For example, we were the prime contractor for supporting the National Infrastructure Protection Plan (NIPP) Project Management Office starting in 2004 through 2012. Our team helped the newly formed Department of Homeland Security to design and execute a process that identified our **nation’s most critical infrastructure and determined how to prioritize and provide funding to protect building, bridges, air and water ports, food and water supplies, hospitals and a broad range of facilities across the country.** ICF also served as prime contractor to start the national Broadband Initiatives Program (BIP), a project for providing grants and loans to make broadband infrastructure possible throughout rural America. We are also the prime contractor standing up a program to support the Department of Energy, Office of Electricity Delivery and Energy Reliability (OE) in its mission to modernize and protect our national electrical grid.

#### PROJECT EXAMPLE: BROADBAND INITIATIVES PROGRAM

ICF is assisting with the implementation of the Rural Utilities Service’s ARRA-mandated BIP, an initiative to bring broadband infrastructure to rural communities across the country. In doing so, ICF has reviewed more than 2,000 applications requesting nearly \$30 billion dollars. Applications are reviewed by ICF analysts who assess both the financial and technical feasibility of the plans put forth in the **applications. Applications are also reviewed by ICF’s geospatial analysts, who overlay applicant drawn maps with multiple data sources to determine if applications meet program eligibility requirements (e.g. percentage of proposed service area is rural) and to verify scoring metrics (e.g., distance to nearest non-rural area).**

ICF has provided two onsite specialists to provide NEPA, Section 106 cultural, and Endangered Species Act review of

applications and to assist in determining any mitigation required by awardees. In addition, ICF will continue to provide support during implementation of the 320 BIP awards. ICF has developed a robust reporting capability to provide both regular and ad hoc reports and analyses. Reports often cover topics pertaining to target geographic **areas, application statuses, and award projections.** ICF’s reporting and geospatial staff also work together to analyze incumbent comments provided through a public notice processes and determine their impact on applications.

In addition to the environmental compliance, BIP is an example of a complex, integrated project that required a project management program; a robust IT and data tracking capability, and management of grants administration process to track applications through the review and award process. *ICF’s ability to rapidly ramp-up operations was praised by the Undersecretary for Rural Development in a letter sent to the Government Accountability Office.*

**CLIENT CONTACT:** Laura Henley Dean, PhD., Archeologist, Federal Preservation Office, (202) 720-9634, laura.dean@wdc.usda.gov



## 6. Resumes

Resumes for ICF Team's core management staff and key personnel are included in a separate document labeled *Tab 6. Resumes*. Resumes are presented in alphabetical order beginning with the core management staff.



## Scott Ledford

## ICF International

### Education

MPA, The LBJ School of Public Affairs, The University of Texas, 1998

### Background

*Mr. Ledford is a Principal in ICF's Housing and Community Development Group with more than 20 years of experience designing and implementing programs, directing and managing projects and teams, developing and delivering training and technical assistance, and conducting research and evaluation. He contributes knowledge and experience in the design, development, and management of large- and small-scale programs and projects, with specific subject matter expertise in housing, community development, and economic development, real estate finance and development, policy and process development and analysis, leadership and organizational development, regulatory compliance, architecture, and urban planning. In addition to working with ICF since 1998 in the firm's Washington, D.C., San Francisco, California, and Baton Rouge, Louisiana offices, Mr. Ledford has worked for a local government implementing federally funded programs, a real estate development firm originating and underwriting development projects, and universities and colleges directing operations and developing future leaders.*

### Recent Experience

**State of New Jersey CDBG Disaster Recovery Programs, Department of Community Affairs, 2013–present.** As a member of the ICF team providing support to CDBG disaster recovery activities in New Jersey, Mr. Ledford assisted with early program design considerations and helped develop initial process flows for the LRRP, and continues to provide ongoing advisory services related to LRRP requirements and RREM policies and procedures.

**State of Louisiana CDBG Disaster Recovery Program, Louisiana Office of Community Development, 2006–2008.** Mr. Ledford contributed to Louisiana's \$10+ billion dollar CDBG-funded hurricane recovery effort for more than two years after Hurricanes Katrina and Rita, including proposal development, program design, regulatory compliance, project ramp-up, and ongoing operations. The contract was awarded to ICF in June 2006, and Mr. Ledford relocated to Baton Rouge in October 2006 to provide full-time onsite support.

Mr. Ledford became ICF's Rental Property Program Director in April 2007, leading, directing, and managing the efforts of 300+ staff and subcontractors to deliver the \$829 million program with more than 18,000 applicants. His responsibilities in this role involved coordination with senior government and elected officials, program applicants, and company executives, as well as directing the efforts program managers, staff, subcontractors, and internal support functions such as communications, outreach, training, and information technology.

Through March 2007, Mr. Ledford was Deputy Director of Policy and Planning for the overall Road Home organization, identifying and addressing programmatic, technical assistance, and training needs with staff, subcontractors, and a variety of subject matter experts across the country within extremely demanding timeframes. He advised State policy makers on relevant federal regulations, their implications, and alternative options as the homeowner, rental, economic development, and homelessness programs were being designed and delivered training sessions on the emerging program requirements to the hundreds of program staff being



hired throughout the state.

Mr. Ledford also conceptualized and directed the development of a neighborhood recovery tracking resource that was ultimately deployed onto the Internet to assist the 100,000+ Road Home applicants in determining whether basic life, community, and commercial services were available in their neighborhoods throughout southern Louisiana. This involved research design and implementation, data and database design and management, quality control and assurance, technology solutions, and process and organizational development.

**Community Development Technical Assistance, U.S. Department of Housing and Urban Development, 1999–2006.** As contract manager for four HUD Field Offices, Mr. Ledford delivered consulting services to state and local government officials and non-profit organizations throughout the country on project development, program design, and regulatory compliance associated with HOME, CDBG, Section 108, and other public funding programs. His specific work included:

- Assisting clients to interpret and apply complex federal regulations to better understand their impacts on project feasibility, program design, and management systems
- Creating customized implementation tools and materials for clients, including financial analysis models, performance tracking systems, policy white papers, and procedures manuals
- Managing technical assistance and training projects, including conceptualizing projects, budgeting, staffing, overseeing subcontractors, and ensuring quality service within budgets
- Serving as primary client representative and contract manager, including responding to requests for services, directing projects, performing management and financial analysis, and developing and providing reports
- Providing one-on-one technical assistance, as well as group training, on a range of economic development, community development, and housing topics, including market analysis, deal structuring, performance and productivity measurement, organizational development, program evaluation, and management systems

**Broadband Initiatives Program, U.S. Department of Agriculture, Rural Utilities Service, 2009–Present.** As Project Director for the \$2.7 billion BIP Program, Mr. Ledford has worked directly with agency leadership to interpret program statutes and regulations, create application materials for public distribution, develop application review policies, design application review tools, discuss application funding recommendations, develop award administration and monitoring protocols, and build or modify information technology systems to accommodate workflow, reporting, and data management needs. He has also worked closely with ICF's task managers to design application review processes, review outputs and outcomes, adjust policies and operations as appropriate, develop and execute awardee site visit protocols, and ensure delivery of results that are consistent with program requirements and client expectations. He has explicitly involved engineering, business, and geospatial analysis experts and coordinated closely with information technology, reporting, and training functional leads. In the first competitive funding round, the BIP program received and reviewed 1,274 technically complex applications for almost \$18 billion from telecommunications companies, non-profit organizations, state and local governments, and other entities. In less than six months from contract award,





ICF built program review policies, tools, teams, and management systems, processed all applications, and provided the client with a funding recommendation for each application.

### Client References

<b>Title of Project:</b> Broadband Initiatives Program	
<b>Name:</b> [REDACTED]	<b>Phone:</b> [REDACTED]
<b>Address:</b> U.S. Department of Agriculture, STOP 1590, 1400 Independence Ave., SW, Rm 5151, Washington, D.C. 20250-1590	<b>Email:</b> [REDACTED]
<b>Title of Project:</b> The Road Home Program	
<b>Name:</b> [REDACTED]	<b>Phone:</b> [REDACTED]
<b>Address:</b> 4100 Touro Street, New Orleans, LA 70122	<b>Email:</b> [REDACTED]
<b>Title of Project:</b> Community Development Technical Assistance	
<b>Name:</b> [REDACTED]	<b>Phone:</b> [REDACTED]
<b>Address:</b> 451 7 <sup>th</sup> Street SW, Washington, D.C. 20410	<b>Email:</b> [REDACTED]

### Work History

Company	Position	Years
ICF	Principal	2011-Present
	Senior Manager	2010-2011
	Senior Project Manager	2008-2010
ICF (Baton Rouge, LA)	Project Manager	2006-2008
ICF Consulting (San Francisco, CA)	Technical Manager	2004-2006
Sterling Development, LLC	Development Originator	2003-2004
ICF Consulting	Technical Manager	2002-2003
	Senior Associate	2000-2001
ICF Kaiser	Associate	1998-2000
City of Austin, TX	Development Specialist	1997-1998
Texas Union, UT-Austin	Program Advisor	1996-1997
Green Mountain College	Complex Coordinator	1994-1996
Virginia Tech	Head Resident Advisor	1992-1994



## Elaine Adams

## ICF International

### Education

BS, Business Administration and Accounting, Stockton State College, Pomona, NJ

AA, Business Administration, Mercer County Community College, West Windsor, NJ

Financial Management Curriculum for Chief Financial Officer, Rutgers, The State University of New Jersey for Local Government Services, New Brunswick, NJ

### Background

*Elaine Adams began her 25-year career in Trenton with the State of New Jersey Department of Environmental Protection where she developed strong working relationships with State of New Jersey and DEP staff across departments and divisions. Most recently, she was responsible for maintaining the City's \$40M annual HUD CDBG budget, for which she tracked, posted, generated payroll, and maintained CDBG payroll responsibilities. Because HUD requires complete justification for any City employee funded by CDBG, Ms. Adams understands the accuracy required of CDBG documentation. In addition to her CDBG experience, she has served as the Grant Administrator for the City of Trenton for 21 years, in which capacity she administered Clean Communities funding, Hazardous Discharge funding, and other grants from the State of New Jersey and DEP. Her responsibilities included monitoring and directing over 50 specific grants and preparing fiscal reporting for Federal, State, County, and private funders. Ms. Adams' positive working relationships with State and City staff has helped to forge a productive grant partnership between the two entities, bringing DEP an accounting and reporting lead that can get things done efficiently and in compliance with myriad federal and state regulations. This experience is invaluable to DEP in that it will allow Ms. Adams to perform the required accounting and reporting functions under this contract to HUD standards.*

### Recent Experience

#### **Assistant Chief Accountant, City of Trenton, New Jersey, 1986–Present.**

- Maintain grant accounting for a budget of approximately \$40 million
- Monitor and direct finances for over fifty grants
- Prepare fiscal reporting and coordinate internal activities for federal, state, county, and private funders
- Analyze needs and help determine the allocation of resources to best benefit to the City of Trenton, New Jersey
- Ensure compliance and appropriate use of grant budgets along with internal grant personnel

#### **Business Administrator, City of Trenton, New Jersey, 2010–2011.**

- Oversaw administrative functions related to managing the City
- Planned, controlled, organized, staffed, and directed operations of the City
- Acted as a liaison between departments within the City
- Coordinated initiatives with Law, Administration, Housing and Economic Development,



Recreation, and various federal, state, and county agencies

**Director of Finance, City of Trenton, New Jersey, 2010–2011.**

- Directed the development and strategic planning of the City’s sustainability objectives
- Implemented and influenced material business decisions, and assessed opportunities and risk
- Managed finance operations throughout the City and safeguarded public funds

**Work History**

Company	Position	Years
City of Trenton, New Jersey	Assistant Chief Accountant	1986-Present

**References**

<b>Title of Project:</b> State of New Jersey, Department of Health and Senior Services, WIC	
<b>Name:</b> ██████████ ██████████	<b>Phone:</b> ██████████
<b>Address:</b> P.O. Box 360, Trenton, NJ 08625-0360	<b>Email:</b> ██████████
<b>Title of Project:</b> BRS, Inc.	
<b>Name:</b> ██████████	<b>Phone:</b> ██████████
<b>Address:</b> P.O. Box 420, Mail Code: 05K, Trenton, NJ 08625	<b>Email:</b> ██████████
<b>Title of Project:</b> State of New Jersey, Department of Environmental Protection	
<b>Name:</b> ██████████	<b>Phone:</b> ██████████
<b>Address:</b> Department of Environmental Protection, 401 East State Street, Trenton, NJ 08608	<b>Email:</b> ██████████ ██████████





## Bob Gawler

## ICF International

### Education

MS, IT Systems Management, American University, 2005

BA, History, Citadel, 1991

### Background

*Mr. Gawler has over 15 years of experience providing consulting services to public and private sector clients in the areas of program/project management, systems development, and organizational effectiveness. Mr. Gawler partners with his clients to identify, develop, and implement business and technology-based solutions by translating clear objectives into actionable initiatives to improve operational effectiveness.*

- *As Task Order Manager at FAA, introduced an Agile approach for custom application development and shortened delivery schedules from 6 months to 60 days and decreased rework by 40%.*
- *As a Program Management consultant to U.S. Forest Service, implemented a program management solution for financial estimation, planning, and execution processes for USD \$26 million radio modernization program.*
- *As a Business Solutions Architect, worked with 12 AMTRAK business units and technical development staff to identify critical business data and implement a data warehouse to provide a business intelligence solution (BI).*
- *Selected as Project Manager for a Joint-Venture (JV) with TeliaSonera to offer managed hosting services in Western Europe. Worked with McKinsey & Co. to evaluate Digex's intellectual property (IP) and provided oversight for selection and build-out of the JV's first data center in the United Kingdom.*

### Recent Experience

**(Acting) Assistant Director for Reporting and Information Management, New Jersey Department of Community Affairs, ICF, 2013–2014.** The Department of Community Affairs (D.C.A) was designated as the grant management agency for \$1.2B in Community Development Block Grant Disaster Recovery (CDBG-DR) by the Department of Housing and Urban Development (HUD). Mr. Gawler filled the role of Assistant Director for Reporting and Information Management until a full-time resource was hired by the state. He was responsible for organizing, managing, tracking, and reporting on key program performance data across 17 programs. The role required coordination with recovery program managers of record, state entities, and sub-recipients to collect, exchange, and disseminate data. Mr. Gawler was also responsible for mapping out system requirements for reporting and coordinating with the state's IT vendor to implement and test technology solutions to meet program reporting requirements.

**Task Order Manager, Federal Aviation Administration, ICF, 2011–2013.** The Federal Aviation Administration (FAA) needed to implement a new model for enterprise application development and sustainment that was aligned with a performance-based contract for their Corporate Work Plan (CWP) Enterprise Resource Management (ERP) tool. Mr. Gawler was brought in to take over the fiscal and technical management of the full life cycle of services





worth over \$5M annually. He implemented an Agile development approach to shorten delivery schedules and decrease development rework. Within 4 months of becoming Task Order Manager at the FAA, he improved fiscal performance to a 'B' and technical performance to an 'A' following the prior ratings period ratings of D and C respectively. As a result the FAA requested Mr. Gawler act as the Project Manager for the upgrade and consolidation of the CWP toolset, which included a toolset of 13 applications and the design and implementation of a new system architecture.

#### **Program Management Office Lead, Department of Agriculture, Dakota Consulting, 2011.**

While employed at Dakota Consulting, Mr. Gawler led the formation and stand-up of the USDA Agriculture Security Operations Center (ASOC) Program Management Office (PMO). The office was founded to provide portfolio management and control oversight for the programs of record under the Assistant-CIO for Security. He led a geographically distributed team in the assessment of the portfolio of security posture improvement work valued at \$32M. As PMO lead, Mr. Gawler was responsible for the development and implementation of the ASOC project management framework and associated policies and procedures.

#### **Work History**

Company	Position	Years
ICF	Senior Project Manager	2011-Present
Dakota Consulting	PMO Lead	2011-2011
Octo Consulting	Associate	2009-2011
Citadel Business Solutions	President	2006-2009
SAIC	Senior Management Consultant	2005-2006
Fannie Mae	Senior Manager	2004-2005
Discovery Communications	Technical Project Manager	2000-2005
Digex	Technical Project Manager	1998-2000
United International Supplies	Project Manager	1995-1998

#### **References**

<b>Title of Project:</b> Task Order Manager, Federal Aviation Administration	
<b>Name:</b> ██████████	<b>Phone:</b> ██████████
<b>Address:</b> Federal Aviation Administration, 1575 I St NW, Washington, D.C. 20005	<b>Email:</b> ██████████
<b>Title of Project:</b> Program Management Office Lead, Department of Agriculture	
<b>Name:</b> ██████████	<b>Phone:</b> ██████████
<b>Address:</b> U.S. Department of Agriculture, 1400 Independence Ave. SW, Washington, D.C. 20250	<b>Email:</b> ██████████



## Bon Provenzano

## ICF International

### Education

M.S., Transportation Management, Florida Institute of Technology (online), 2014  
B.S., Applied Mathematics, University of Illinois, 1995

### Certifications

- Project Management Professional, 2013
- Project Management Graduate Certificate, Empire State College 2012
- Certified Six Sigma Black Belt 2012
- Certified Quality Engineer, American Society for Quality 1998
- Diploma in Drafting, Ulster College 1990

### Background

*Mr. Provenzano has more than 17 years of experience providing project management oversight on a number of large projects, filling numerous leadership roles to successfully drive projects, programs and corporate operations. Mr. Provenzano has extensive experience in both program service delivery and internal operations management. Mr. Provenzano is uniquely qualified as a Program Manager having earned professional certifications as a Project Management Professional, a Graduate Certificate in Program Management and a Six Sigma Black Belt in quality. A program manager that can speak equally to these disciplines is a strong asset to any program. In his role as a project manager, Mr. Provenzano supports the management of resources across project departments, monitors compliance, develops shared documentation such as reporting and monitoring templates and identifies project management methodology and best practices following the Project Management Body of Knowledge (PMBOK) guiding principles. Mr. Provenzano is adept at writing and maintaining Project Management Plans, Quality Plans and other program related documentation required to support planning, coordination, and execution of project activities. Mr. Provenzano is a proven thought leader and has a well-deserved reputation as a hands-on manager capable of meeting critical challenges over the duration of a program.*

### Recent Experience

**British Aerospace Engineering Systems, Barrow-in-furness, Cumbria, England, Project and Quality Manager March 2005–Present.** Mr. Provenzano is responsible for managing all aspects of project management related to development and production of a complex control/display system. In this role, he acts as the single point of contact for all project management, engineering, supply chain, and manufacturing operations activities between program management and the customer. Mr. Provenzano provides subcontract management support, performs risk assessment and monitoring and develops templates to track program schedule, cost and performance. He conducts regular audits throughout the supply chain to ensure projects are on track to meet critical success goals. Mr. Provenzano creates and presents project briefings, compliance reports, and performance reports to executive staff.



**Microvision, Inc., Bothel, Washington and Batam, Indonesia, Contract Manufacturer and Technical Project Liaison October 2002–November 2003.** Mr. Provenzano provided on-site project management and quality oversight functions related to the development and production of a hand-held barcode scanner. Working closely with production management, purchasing, and suppliers from Singapore, Indonesia and China, he successfully reared a non-functional design specification into full production line with little support in a foreign country and unfamiliar culture. Utilizing his background in quality, Mr. Provenzano used Six Sigma methodologies to identify and eliminate sources of variation in the set-up, capability qualification and optimization of 32 assembly stations. This required extensive component level analyses to resolve significant design issues.

**Microvision, Inc., Bothel, Washington and Batam, Indonesia, Senior Quality Engineer June 1999–September 2002.** Acting as the Senior Quality Engineer and project manager in the assembly of two generations of Retinal Scanning Displays, Mr. Provenzano successfully led the program management and construction of a controlled optical production department as well building 25 prototype systems on schedule and within budget. He was required to coordinate production parts across Asia, ensuring the arrival, storage and spares required to support the production line. Applying his strong background in Quality, Mr. Provenzano led the QE initiative in attaining ISO 9001 registration, also writing QE Work Instructions. He used Six Sigma methodologies to fully qualify two new production lines and then to detect and eliminate causes of variation. Mr. Provenzano was responsible for the support and training of two interdepartmental Quality Engineers.

### Work History

Company	Position	Years
British Aerospace Engineering Systems	Project and Quality Manager	2005–Present
Microvision Inc.	Project Manager/ Advanced Quality Engineer	2002–2003
	Sr. Quality Engineer/Program Manager	1999–2002

### References

<b>Title of Project:</b> British Aerospace Engineering Systems	
<b>Name:</b> [REDACTED]	<b>Phone:</b> [REDACTED]
<b>Address:</b> 1 The Barns, Bank End Great Urswick, Ulverton, LA12 OSW, UK	<b>Email:</b> [REDACTED]
<b>Title of Project:</b> Microvision, Inc.	
<b>Name:</b> [REDACTED]	<b>Phone:</b> ([REDACTED])
<b>Address:</b> 1181 Willows Road NE P.O. Box 97006, Redmond, WA 98073-9706	<b>Email:</b> unavailable.





## Brett D. Rickman

## ICF International

### Education

J.D., Villanova University, 1989  
 A.B., Political Science and Drama (double major), University of Michigan, 1985  
 Villanova Law Remiel Moot Court Program Judge 1990–Present  
 New Jersey, Pennsylvania (inactive) DNJ, EDMI, Us Court of Appeals for the Third Circuit

### Background

*Mr. Rickman has more than twenty years' legal expertise in complex federal and commercial contracting and real estate. Mr. Rickman is a highly skilled negotiator, mediator, litigator (first chair trial and Alternative Dispute Resolution) and problem solver successful at maximizing client operational savings while maintaining corporate compliance within complex federal and state regulatory schemes. Mr. Rickman has extensive experience in commercial and regulatory law including major contracts and federal procurement, corporate compliance, environmental law, litigation (federal, state, and administrative) and privacy issues. In his most recent position, Mr. Rickman served as a senior attorney for the State of New Jersey, Office of the State Comptroller responsible for recovery of improperly expended Medicaid funds, and enforcement of Medicaid rules and regulations. In this role, Mr. Rickman had oversight of audits and investigations of fraud, waste and abuse by health care providers, DMEs, pharmacies, laboratories, and adult medical day care centers.*

### Recent Experience

**State of New Jersey, Office of the State Comptroller, Trenton, NJ, Regulatory Officer, 2012.** Mr. Rickman served as the senior attorney responsible for recovery of improperly expended Medicaid funds, enforcement of Medicaid rules and regulations. For this investigation, Mr. Rickman identified companies and individuals with irregular Medicaid transactions via an audit process, supervised data miners in obtaining a list of products and billing entities, performed comparative analysis and drafted reports of findings to counsel. In addition to investigation of fraud, waste and abuse, Mr. Rickman reviewed and enforced Corrective Action Plans and Corporate Integrity Agreements. Mr. Rickman also provided guidance regarding pending legislation and proposed changes to existing regulations including negotiation of the State's largest Medicaid Contract Organization (MCO) for premium overpayments resulting from unsatisfactory management of program integrity operations and reporting requirements by the MCO's Special Investigations Unit (SIU). Mr. Rickman established the protocol for resolution of Recovery Audit Contractor (RAC) provider/hospital recovery action appeals and successfully supported the SIU's challenged subpoena of business and personal financial records from a DME suspected of civil and criminal fraud and abuse.

**University of Medicine and Dentistry of New Jersey, Stratford, NJ, Senior Staff Attorney, 2007–2010.** Mr. Rickman served as a senior staff attorney managing major legal projects and initiatives, including all site clinical trial and research agreements, procurements, professional services and real estate projects. Mr. Rickman also provided guidance to the Dean on litigation support, health care, employment, taxes, collections, ethics and University policy compliance and served as the liaison for Homeland Security assessment compliance. A few of Mr. Rickman's major accomplishments include achieving a \$1M reduction in overpayment to a client





institute found during multiyear audit of cost and brokerage of a \$500,000 fee dispute with the state government resulting in full payment to the client.

**State of New Jersey Department of Law and Public Safety, Trenton, NJ, Deputy Attorney General, 1990–2007.** Mr. Rickman provided general legal counsel to the New Jersey Department of Transportation, representing the State's transportation entities and the New Jersey Department of Treasury in complex commercial, regulatory, and constitutional litigation in administrative law. In his role, Mr. Rickman oversaw regulatory compliance of state expenditures of federal transportation assistance funds for aeronautics and light rail industries. Mr. Rickman was also responsible for review and approval of all RFPs and sole sourcing documents with private vendors for the NJ DOT Bureau of Research and Technology; negotiating and drafting transactional documents for property transfers, writing interstate commerce modal regulations, and negotiated settlements between federal and state governments and several hundred private sector parties impacted by the CERCLA/Spill ACT.

### Work History

Company	Position	Years
State of New Jersey, Office of the State Comptroller	Regulatory Officer	2012
University of Medicine and Dentistry for New Jersey	Senior Staff Attorney	2007–2010
State of New Jersey Department of Law and Public Safety	Deputy Attorney General	1990–2007

### References

<b>Title of Project:</b> State of New Jersey, Office of the Comptroller	
<b>Name:</b> ██████████	<b>Phone:</b> (██████████)
<b>Address:</b> OSC, P.O. Box 025, Trenton, NJ 08625	<b>Email:</b> ██████████
<b>Title of Project:</b> University of Medicine and Dentistry for New Jersey	
<b>Name:</b> ██████████	<b>Phone:</b> ██████████
<b>Address:</b> UMDNJ, Legal Management, 65 Bergen Street, Newark, NJ 07101	<b>Email:</b> ██████████
<b>Title of Project:</b> New Jersey Department of Law and Public Safety	
<b>Name:</b> ██████████	<b>Phone:</b> (██████████)
<b>Address:</b> State Ethics Commission, P.O. Box 082 Trenton, NJ 08625	<b>Email:</b> ██████████



## Richard Starzak

ICF International

### Education

M.A., Architecture: History, Criticism and Analysis, University of California Los Angeles, 1994  
B.S., Biology, Brown University, 1976

### Background

*Mr. Starzak has 34 years of experience, specializing in consultation on behalf of federal agencies for compliance with Section 106 of the National Historic Preservation Act (NHPA). He has conducted Section 106 or SHP.O. consultation in 44 states for a variety of federal agencies including DHS, DOE, EPA, FCC, FEMA, FHWA, FRA, FTA, GSA, HUD, STB, USDA and USDVA. He has earned a reputation for problem solving when historic properties cause constraints by developing creative alternatives, approaches, consultation documents and mitigation. He meets the Secretary of the Interior's PQS in architectural history.*

**Section 106.** *In 2012, Mr. Starzak was primary author of a Congressional study for the Federal Railroad Administration on streamlining Section 106 compliance for federally funded railroad infrastructure repair and improvement projects. It was submitted to Congress on April 18, 2013. In 2011, for the California Weatherization program, just before implementation of the Section 106 Programmatic Agreement (PA) began, Mr. Starzak consulted with the California SHP.O. and developed reasonable ways to streamline PA compliance for the high volume of reviews. He created a series of six "review scenarios" that minimized documentation of NRHP-ineligible properties and scaled the level of effort needed to assess effects to be commensurate with the severity of effects by Weatherization activities. This post-PA SHP.O. consultation facilitated review to meet a 1-2 business day turnaround so that funds could be allocated quickly, and it substantially decreased the consultant cost than if the scope had followed the PA as written. In 2006, Mr. Starzak worked directly with FHWA's Federal Preservation Officer and wrote the guidance and criteria to identify the elements of the entire 40,000+ mile Interstate Highway System that have national or exceptional significance and remain subject to Section 106.*

### Recent Experience

#### **Neighborhood Stabilization Program 2, Section 106 Technical Assistance—U.S. Department of Housing and Urban Development, Multiple Cities, Michigan, 2012–2013.**

Section 106 team leader. Under a technical assistance contract with HUD, ICF supports the responsible entities, the Michigan State Housing Development Authority (MSHDA) and its 14 consortium members, to comply with Section 106 and Part 58 in implementing the Neighborhood Stabilization Program (NSP) 2. Michigan received more NSP2 funds (\$327.5 million) than any other state. A severe economic downturn led to population loss and many abandoned buildings that lowered housing market prices and attracted criminal activity to many residential neighborhoods. Over the first two years of NSP2, Section 106 regulations were a severe bottleneck in spending progress. In the third year, ICF's role was expanded to assist MSHDA directly with Section 106 compliance. ICF architectural historians' depth of understanding and experience in Section 106 allowed them to re-establish effective consultation between MSHDA, consortium members and the Michigan SHP.O.. In ten months, ICF helped



MSHDA through Section 106 and use HUD's funds to rehabilitate or demolish hundreds of buildings.

**Weatherization Assistance Program—California Department of General Services, California, 2010–Present.** Serves as project director. Consults with the California SHP.O. and assists the California Department of Community Services and Development (CSD) in the implementation of a PA for the Section 106 review of weatherization projects federally funded by DOE and HHS. In the first 18 months, the ICF team completed over 10,000 Section 106 reviews across the entire state.

**HUD Section 106 Review, City of Los Angeles Community Development Department and Housing Department, California, 2005–Present.** Serves as project director. ICF is the City's Historic Preservation Consultant for all HUD-funded Section 106 review undertakings completed under a PA among the City, SHP.O., and ACHP.

**NHPA Section 106 Consultation for FRA-Amtrak Northeast Corridor FUTURE investment program, Washington, D.C. to Boston, MA, 2012–Present.** Assisting FRA with Section 106 strategy for the conversion to high speed service of the Amtrak Northeast corridor from Washington to Boston. Assisting with consultation among FRA, ACHP and nine SHP.O.s (including New Jersey). Drafting the PA and Section 106 compliance and NEPA/Section 106 coordination memoranda for this complex, multi-state, tiered project.

**Congressional Study to Streamline Historic Preservation Laws for Federally Funded Railroad Projects—FRA, Nationwide, 2010–2012.** Primary author. ICF worked directly with FRA Headquarters to conduct a study ordered by Congress to streamline Section 106 of the NHPA and Section 4(f) of the DOT Act for federally funded railroad infrastructure repair and improvement projects. Prepared several draft streamlining documents including a Section 106 administrative exemption and Programmatic Agreement, and a nationwide 4(f) legislative exemption. The study was submitted to Congress on April 18, 2013, and is on FRA's website at <http://www.fra.dot.gov/eLib/details/L04483>.

### Work History

Company	Position	Years
ICF	Senior Architectural Historian	1984–2013
Roger G. Hatheway & Associates, Inc.	Historic Research Assistant	1979–1984

### References

<b>Title of Project:</b> HUD Section 106 Review, Los Angeles Community Development Department and Housing Department	
<b>Name:</b> ██████████, Environmental Specialist II	<b>Phone:</b> ██████████
<b>Address:</b> LACDD, 1200 W. 7 <sup>th</sup> St., 4 <sup>th</sup> Floor, L.A., CA 90017	<b>Email:</b> ██████████
<b>Title of Project:</b> Weatherization Assistance Program—California Department of General Services, California	
<b>Name:</b> ██████████ Senior Environmental Planner	<b>Phone:</b> ██████████
<b>Address:</b> California DGS, 707 Third Street, Suite 3-401, West Sacramento, CA 95605	<b>Email:</b> ██████████





<b>Title of Project:</b> HUD Neighborhood Stabilization Program 2—Section 106 Technical Assistance, Michigan	
<b>Name:</b> [REDACTED] Acting Senior Policy Specialist	<b>Phone:</b> [REDACTED]
<b>Address:</b> Michigan State Housing Department, 735 E. Michigan Avenue, Lansing, MI 48909	<b>Email:</b> [REDACTED]
<b>Title of Project:</b> FRA-Amtrak Northeast Corridor FUTURE investment program, Washington, D.C. to Boston, MA and FRA-Congressional Study to Streamline Historic Preservation Laws for Federally Funded Railroad Projects	
<b>Name:</b> [REDACTED], Federal Preservation Officer	<b>Phone:</b> [REDACTED]
<b>Address:</b> Federal Railroad Administration, 1200 New Jersey Avenue SE, MS-20/W38-303, Washington, D.C. 20590	<b>Email:</b> [REDACTED]





## Neil Sullivan

## ICF International

### Education

M.S., Integrated Environmental Management, University of Bath, United Kingdom, 1999

B.S., Human & Physical Geography, University of Reading, United Kingdom, 1994

### Background

*Mr. Sullivan has 17 years of experience in environmental impact assessment, local and federal environmental program management, technical analysis, policy analysis, and strategic planning. He has extensive experience in the preparation and review of NEPA documents. He is currently providing environmental technical assistance support to the New Jersey D.C.A/DEP. Work involves providing guidance on compliance with HUD's environmental regulations at 24 CFR Part 58 for the first \$1.8 billion of Hurricane Sandy relief funding.*

*Mr. Sullivan managed environmental technical assistance support to the Michigan State Housing Development Agency under a contract with HUD. He was also project manager for ICF NEPA support to the U.S. Department of Energy (DOE) Loan Programs Office and was the project manager for ICF's NEPA support for American Reinvestment and Recovery Act to the DOE Office of Energy Efficiency and Renewable Energy. Neil was ICF's project manager for the Nevada National Security Site Site-Wide EIS. Neil was deputy project manager and instrumental in the preparation of a major DOE EIS and Supplemental EIS for a rail line to Yucca Mountain in Nevada. For several years, he has worked with the Surface Transportation Board (STB) on rail projects in Montana, Alaska, Nevada, Texas, Missouri, Illinois, Kansas, and Massachusetts. He also has assisted other federal agencies, including the U.S. Nuclear Regulatory Commission (NRC), the Federal Aviation Administration, the U.S. Department of Justice, the U.S. Environmental Protection Agency, the Federal Energy Regulatory Commission, the Drug Enforcement Administration, the Federal Housing Finance Agency, and the Federal Motor Carrier Safety Administration, in preparing NEPA documents, and has worked extensively with the U.S. Department of Defense, the U.S. Navy, and the U.S. Air Force in managing, developing, and analyzing environmental programs.*

### Recent Experience

**NEPA Support to New Jersey D.C.A/DEP for Hurricane Sandy Relief, February 2013–Present.** Mr. Sullivan is managing the provision of ongoing environmental technical assistance support to the New Jersey D.C.A and DEP. This work started under a Technical Assistance contract with HUD and has continued under a direct contract with the State of New Jersey. Work involves providing guidance on compliance with HUD's environmental regulations at 24 CFR Part 58 for the first \$1.8 billion of Hurricane Sandy relief funding.

**NEPA Support to Michigan State Housing Development Authority (MSHDA), November 2011–Present.** Mr. Sullivan is managing the provision of ongoing environmental technical assistance support to the MSHDA under a contract with HUD. Work involves technical assistance for projects receiving Neighborhood Stabilization grant funds from HUD. Mr. Sullivan provides guidance and NEPA document preparation services to MSHDA and twelve Michigan communities. He has also delivered environmental training to MSHDA and community land bank staff that covers compliance with HUD's NEPA regulations.



**NEPA Support—U.S. Department of Justice, Office of Justice Programs, Nationwide, April 2001–September 2013.** Served as Project Manager. Mr. Sullivan assisted in the preparation and review of more than 150 EAs for proposed new and expanded prisons, juvenile detention facilities, and other projects receiving federal grant funds across the United States. He also assisted grantees with evaluating NEPA requirements, consulting with federal agencies and State Historic Preservation Officers, and ensuring compliance with applicable regulations. For example, Mr. Sullivan prepared an EA for the Merced County Juvenile Justice Correctional Complex in Merced County, California. The project involved close coordination with the U.S. Fish and Wildlife Service and Merced County officials to resolve complex endangered-species issues. He prepared a Draft EA for the proposed Youth Development Center in Manchester, New Hampshire, on the site of a 150-year-old detention facility. He interacted closely with the New Hampshire State Historic Preservation Officer to resolve historic preservation issues under the National Historic Preservation Act Section 106 process. He prepared an EA for a Halfway-Back Facility in Chicago. Mr. Sullivan assisted in the preparation and review of two EISs in California and Hawaii and two joint EIS/EIR documents in California for projects in Fresno and Alameda Counties and attended public meetings for all three projects. The work involved close interaction with county officials, the Department of Justice, the California Board of Corrections, the Hawaii Department of Public Safety, and other contractors, in addition to explaining projects to members of the public and reviewing draft documents.

**NEPA Support for American Recovery and Reinvestment Act Projects—DOE, Nationwide, 2009–2012.** The DOE Office of Energy Efficiency and Renewable Energy (EERE) provides grants to various recipients of the Energy Efficiency and Conservation Block Grant (EECBG) program and state energy offices through the State Energy Program (SEP) as part of the American Recovery and Reinvestment Act (ARRA) of 2009.

Mr. Sullivan served as Project Manager for ICF's NEPA support to DOE's EERE office in reviewing EECBG Program and SEP grant applications that are funded by ARRA. ICF assisted in making NEPA determinations for thousands of projects as part of DOE's \$3.6 billion in ARRA funding. This high profile project operated under intense scrutiny from the Vice President's office and ICF was instrumental in helping DOE perform NEPA reviews quickly to allow grant funds to be disbursed.

ICF assisted in managing and preparing over 70 EAs for projects that include solar photovoltaic systems, wind farms, single wind turbines, geothermal systems and ground source heat pumps, biomass systems, industrial energy efficiency retrofits, anaerobic digesters, biorefineries, and other renewable energy projects. These projects are located throughout the United States and its territories. ICF worked directly with DOE to provide overall management and support for compilation and completion of the EAs, which had extremely aggressive schedules due to ARRA funding and timing requirements.



**NEPA Support to the Loan Programs Office—DOE, Nationwide, 2009–2011.** Served as Project Manager for ICF's task to review and assist in the preparation of EAs and EISs for projects submitted to DOE by loan applicants in response to solicitations for fossil energy advanced technologies; energy efficiency, renewable energy, and advanced transmission and distribution technologies; advanced technology vehicle manufacturing; and other solicitations. Under this contract ICF has also prepared assessments of compliance with DOE's Floodplain and Wetland Environmental Review Requirements. Projects have included:

- **EA for Solana Thermal Electric Power Project, near Gila Bend, Arizona.** The proposed project, a 280 MW concentrating solar power plant, involved installation of approximately 2,700 parabolic trough collectors covering roughly 1,757 acres (three square miles). Managed the review of the EA and provided technical comments to DOE.
- **EIS for Topaz Solar Farm, San Luis Obispo, California.** This project is a 550 MW photovoltaic solar power plant. The project site is within unincorporated eastern San Luis Obispo County, approximately one mile north of the community of California Valley and six miles northwest of the Carrizo Plain National Monument. Managed the review of the EIS and provided technical comments to DOE.
- **EA for AV Solar Ranch One, Los Angeles and Kern Counties, California.** The proposed project, a 230MW photovoltaic solar power plant, consists of a solar generation facility and a 230kV transmission line. The solar facility would be located in the Antelope Valley, in unincorporated Los Angeles County. The transmission line would enter Kern County. Managed the review of the EA and provided technical comments to DOE.
- Other projects included four manufacturing facility EAs; four EISs for industrial gasification facilities in Indiana, Illinois, Mississippi, and Wyoming; an EA for a biorefinery in Florida; an EA for a 30MW wind farm on Oahu, Hawaii; an EA for a 50MW wind farm in Maine; and an EA for a 200MW wind farm in Illinois.

### Work History

Company	Position	Years
ICF	Project Manager/Senior Manager	2007–Present
	Senior Associate	2003–2006
	Associate	2001–2002
Booz, Allen & Hamilton, Inc.	Senior Consultant	1999–2001
	Consultant	1998–1999
Robinson's Greenhouses Ltd.	Production Coordinator	1996–1997
Mendip District Council	Local Agenda 21 Project Officer	1995
Prince William County Park Authority	Intern	1994

### References

Title of Project: NEPA Support—U.S. Department of Justice, Office of Justice Programs	
<b>Name:</b> ██████████ NEPA Manager	<b>Phone:</b> ██████████
<b>Address:</b> Bureau of Justice Assistance, Office of Justice Programs, 810 Seventh Street NW, Washington, D.C. 20531	<b>Email:</b> ██████████





<b>Title of Project: NEPA support to Michigan State Housing Development Authority (MSHDA)</b>	
<b>Name:</b> [REDACTED]	<b>Phone:</b> [REDACTED]
<b>Address:</b> Michigan State Housing Development Authority, 735 E. Michigan Ave, P.O. Box 30044, Lansing, MI, 48909	<b>Email:</b> [REDACTED]
<b>Title of Project: NEPA support to New Jersey D.C.A/DEP for Hurricane Sandy Relief</b>	
<b>Name:</b> [REDACTED]	<b>Phone:</b> [REDACTED]
<b>Address:</b> NJ Department of Environmental Protection, Office of Permit Coordination and Environmental Review, 401 E. State Street, Trenton, NJ 08625	<b>Email:</b> [REDACTED]
<b>Title of Project: NEPA Support to the Loan Programs Office—DOE</b>	
<b>Name:</b> [REDACTED]	<b>Phone:</b> [REDACTED]
<b>Address:</b> U.S. Department of Energy, Loan Programs Office, 1000 Independence Ave., SW, Washington, D.C. 20585	<b>Email:</b> [REDACTED]
<b>Title of Project: NEPA Support for American Recovery and Reinvestment Act Projects—DOE</b>	
<b>Name:</b> [REDACTED]	<b>Phone:</b> [REDACTED]
<b>Address:</b> U.S. Department of Energy, Golden Field Office, 1617 Cole Boulevard, Golden, CO 80401-3393	[REDACTED]





## Charles Bien

## ICF International

### Education

M.S., Public Management Science, Case Western Reserve University, 1968

B.S., Community Planning, University of Cincinnati, 1966

### Background

*Mr. Bien is a certified City Planner with over 20 years of experience performing and directing others to perform environmental reviews for compliance with all HUD programs. For over 12 years, he directed about 50 HUD environmental professional staff on all aspects of environmental compliance review including NEPA, floodplain, historic preservation, wetlands, noise, manmade hazards, wetlands, endangered species, and 10 other federal environmental review laws/ executive orders and special regulations. He is familiar with tight deadlines and has much experience with environmental reviews needed for HUD disaster assistance. He has worked with states and cities across the nation to ensure environmental review compliance and meet program objectives and deadlines.*

### Recent Experience

**U.S. Department of Housing and Urban Development, Acting Director, Office of Environment and Energy, 2010–2012.** Responsible for the development of HUD environmental policies and procedures and their enforcement, covering all HUD programs and assistance. Oversaw a staff of about 60 environmental professionals who are responsible for development and enforcement of HUD environmental review requirements. Mr. Bien prepared the first environmental review system that is completely computerized and will permit greater compliance and consistency throughout the nation. When fully implemented, all HUD and HUD grantee staff will be electronically guided through environmental reviews for all forms of HUD assistance (implementation is set for fall 2013). He prepared environmental regulatory policy for wetlands protection and staff trained over 3,000 HUD grantees on environmental review policies and procedures. He implemented a complete series of web based ENVIRONMENTAL WEBINARS on all components of environmental review and signed off on a complete review and recommendations for changes to federal floodplain protection policy. He assisted in drafting early versions of HUD Sandy disaster relief legislation that would eliminate duplicative reviews for HUD and FEMA. Mr. Bien managed the completion of hundreds of HUD environmental staff performed environmental reviews for NSP 2 grants. He also implemented a Native American internet data base that identifies Indian historic preservation interest in HUD grantee specific projects, as part of compliance with the National Historic Preservation Act.

**U.S. Department of Housing and Urban Development, Director, Environmental Review Division, 2001–2013.** Responsible for HUD staff grantee environmental review compliance. Performed reviews on more complex and controversial projects. Responsible for establishing HUD part 50 and 58 review requirements. Responsible for supervising HUD environmental staff who conduct reviews. Developed HUD environmental review training for HUD staff and grantees who conduct reviews. Over 10,000 HUD grantees were trained in 2 and 3 day environmental training courses. Major accomplishments included: issued updated HUD part 50 and 58 requirements, prepared first comprehensive HUD environmental review guide (preparation of this guide helped set the training standards as described above), provided intensive training and



technical assistance to states administering Disaster HUD assistance after hurricanes Rita and Katrina, worked with the White House and the Council on Environmental Quality to deliver a coordinated environmental review for federal disaster assistance, and developed first environmental review guide for HUD Public Housing programs. Mr. Bien consistently provided very high quality environmental review technical guidance to all HUD and grantee staff. He developed HUD field office capacity to conduct environmental reviews. This included hiring, training and supervising a small headquarters staff and about 50 field office environmental staff. Mr. Bien also developed detailed environmental procedures to implement the Recovery and Rehabilitation Act, including guidance to all HUD program areas, including the Neighborhood Stabilization Program.

**U.S. Department of Housing and Urban Development, Senior Environmental Review Officer and Deputy Director Environmental Review Division, 1992–2001.** Responsibilities included performing training and technical assistance for all HUD program and grantee staff who conduct environmental reviews. Mr. Bien trained about 100 Indian tribal presidents and chiefs and their key staff in four 2 day courses on how to administer their newly enacted, legislatively established Indian part 58 environmental review requirements. He developed guidelines for and conducted environmental audits of HUD field staff and HUD grantee environmental review performance. Mr. Bien trained HUD staff on how to perform environmental reviews under part 50 and how their grantees should conduct environmental reviews under part 58. He also prepared special environmental review procedures for HUD assistance to NYC through NY State, for 9/11 disaster recovery.

Other positions held at HUD have included, Special Assistant the Assistant Secretary for Community Planning and Development (on 2 different occasions), Senior Planner administering HUD planning requirements and the Comprehensive Planning Assistance Program and Assistant Director, Office of Community Development Block Grant.

Other career accomplishments have included, preparation of the Plan to save the costal lands and waters of California as the Assistant Director for Plan Preparation of the California Coastal Zone Conservation Commission; Preparation of a comprehensive planning and management improvement plan for the City of Cleveland Ohio, following years of neglect and race riots; Executive Assistant to the former Mayor of Cincinnati (a weak mayor form of government), staff and consulting planner with various large and small municipal, county and regional governments in Ohio and Kentucky; City Manager to a small city in Kentucky.

### Work History

Company	Position	Years
ICF	Expert Consultant	2013–Present
U.S. Department of Housing and Urban Development	Acting Director, Office of Environment and Energy	2010–2012
	Director, Environmental Review Division	2001–2013
	Senior Environmental Review Officer and Deputy Director, Environmental Review Division	1992–2001



## References

<b>Title of Project:</b> U.S. Department of Housing and Urban Development, Acting Director, Office of Environment and Energy	
<b>Name:</b> [REDACTED] Director Office of Environment and Energy, HUD	<b>Phone:</b> [REDACTED]
<b>Address:</b> Suite 7250, HUD Bldg., 451 7 <sup>th</sup> St SW, Washington, D.C. 20410	<b>Email:</b> [REDACTED]
<b>Title of Project:</b> U.S. Department of Housing and Urban Development, Acting Director, Office of Environment and Energy	
<b>Name:</b> [REDACTED] former Director Office of Environmental and Energy, HUD	<b>Phone:</b> [REDACTED]
<b>Address:</b> 6616 Michaels Drive Bethesda, MD 20817	
<b>Title of Project:</b> U.S. Department of Housing and Urban Development, Senior Environmental Review Officer and Deputy Director Environmental Review Division	
<b>Name:</b> [REDACTED] former Director Environmental Review Division, HUD	<b>Phone:</b> [REDACTED]
<b>Address:</b> 52 Kinglet Circle, Greensboro, NC	<b>Email:</b> [REDACTED]





## Tracy Dean

ICF International

### Education

M.H.P., Historic Preservation, Georgia State University, 1993

B.A., Design with Minor in Business, Georgia State University, 1991

### Background

*Ms. Dean is an architectural historian with a strong background in Federal regulatory compliance for Section 106 of the National Historic Preservation Act and the National Environmental Quality Act. She is Secretary of Interior Standards qualified with 20 years of experience in identifying, documenting, assessing and mitigating historic resources throughout the United States. She has personally conducted architectural surveys on more than 15,000 buildings. Ms. Dean has extensive knowledge of the built environment, public infrastructure, and federal processes; and she consistently builds strong teams capable of completing assignments, effectively and efficiently.*

### Recent Experience

**DHS/FEMA Manager in Regulatory Compliance Review.** Ms. Dean is responsible for managing a variety of projects for FEMA as a Technical Specialist under the agency's Public Assistance Program in the Environmental Historic Preservation (EHP) Department. She served with FEMA on two of the nation's largest disasters: Hurricane Katrina in Louisiana and Hurricane Sandy in New York, in addition to federally declared disasters in Missouri.

- Identified and tracked potential issues as Branch Lead in New York on Hurricane Sandy to proactively address issues prior to project implementation which resulted in expedited reviews for rapid project turnaround in 7 New York counties and all New York State Agencies.
- Formed bridges and constructed teams between FEMA EHP, FEMA Public Assistance, State Historic Preservation Officer (SHP.O.) and State Office of Environmental Management to expedite project formulation and shorten time in the EHP review queue.
- Conducted and managed Section 106 consultations with SHP.O. and Tribal Preservation Officer in Louisiana, Missouri and New York on more than 65 projects.
- Managed high profile projects including National Historic Landmarks and Section 106 Consultations with the National Park Service.
- Conducted hundreds of architectural and environmental reviews (Record of Environmental Considerations) in FEMA's review systems, NEMIS and EMIS, ensuring each project was federally compliant.
- Managed architectural assessments/surveys and Section 106 consultations for areas of tornado or flood damaged buildings in Missouri that needed rehabilitation, elevation, mitigation or demolition.
- As a principal author, drafted the *Historic Context Statement for New Orleans Public Schools* (FEMA, 2011) in a shorter time frame than projected. This published document continues to serve as the foundation for Section 106 review related to FEMA's \$1.8 billion grant for the rebuilding of New Orleans' 120 schools damaged or destroyed by Hurricane





Katrina.

- Experienced in FEMA Public Assistance infrastructure on long term, long distance assignments for hurricane, tornadoes, flooding and storm related disasters.

**Historic Preservation.** Since 1992, Ms. Dean has worked in the field of Historic Preservation as a consultant or sub-contractor to cultural resource management firms working on local, state and federally funded projects. Examples of projects include the following:

- Governor appointed high profile public sensitive projects
- FEMA, FCC, DOT, NPS related projects
- National Register Nominations
- Research, Documentation, Consulting for Rehabilitation according to the Secretary of the Interior's Standards for Rehabilitation, and Application for State and Federal Tax Incentives
- Historic Resources Surveys and Reports for Georgia, Alabama and Tennessee
- Conducted chain of title research for 20,000 acres identifying and recreating lost communities on Fort Benning, Georgia
- Surveyed 31 Revolutionary War/War of 1812 Battlefields throughout the state of Alabama for the National Council of SHP.O.s
- Historical Research on military fortifications
- Architectural reviews for cell phone towers in Georgia, Florida, Alabama, Tennessee, Mississippi and North Carolina
- Ground Penetrating Radar Surveys

**Work History**

Company	Position	Years
ICF	FEMA Consultant	2010–Present
Historic Preservation Consultant	Self-Employed Consultant	1993–Present
Golder and Associates	FEMA Consultant	2009–2010

**References**

<b>Title of Project: DHS/FEMA Manager in Regulatory Compliance Review</b>	
<b>Name:</b> [REDACTED] (Ctr) FEMA Response & Recovery Directorate	<b>Phone:</b> [REDACTED]
	<b>Email:</b> [REDACTED]
<b>Title of Project: Historic Preservation</b>	
<b>Name:</b> [REDACTED]	<b>Phone:</b> [REDACTED]
	[REDACTED]



## Catherine Dymkoski

ICF International

### Education

B.S., Wildlife Management, Humboldt State University, Arcata, CA, 1973  
A.A., Los Angeles Pierce Jr. College, Woodland Hills, CA, 1970

### Background

*Ms. Dymkoski has over 37 years of environmental experience working with the National Environmental Policy Act and related federal laws and authorities. She is also an expert in the U.S. Department of Housing and Urban Development's (HUD) environmental compliance regulations because of her many years of employment as a HUD Environmental Officer. Her duties included providing principal leadership and decision making for dealing with inconsistencies between program rules and environmental requirements that could be troublesome to the responsible state and local entities; maintaining liaisons and coordination with other HUD divisions and the Regional Director to ensure the effective delivery of HUD's programs and services; coordinating and developing annual work plans to ensure recipients of HUD assistance received essential environmental services; and analyzing the way recipients of HUD assistance carry out their contractual and program requirements. She provided technical assistance and training to HUD staff, and to cities, counties, states, and Indian tribes receiving Community Development Block Grant (CDBG), HOME Investment Partnerships Program (HOME), McKinney Homeless Assistance Programs, Housing Opportunities for Persons With AIDS (HOPWA), Self-Help Homeownership Opportunity Program (SHOP), Native American Housing Assistance and Self-Determination Act (NAHASDA), public housing and other HUD program funds. Additional responsibilities included monitoring recipients for environmental compliance, and establishing and maintaining intergovernmental relationships with the U.S. Environmental Protection Agency, Advisory Council on Historic Preservation, State Historic Preservation Officers, and state environmental agencies.*

*Since her retirement from federal service in 1999, Ms. Dymkoski has been providing technical assistance and training on environmental compliance requirements to HUD staff and recipients of HUD assistance, including cities, counties, states, Indian tribes, and tribal housing authorities. She has provided these services throughout the United States (including Alaska and Hawaii). Trainees have included recipients of HUD assistance from programs administered by HUD's Office of Community Planning and Development (CPD), Office of Public Housing, and Office of Native American Programs (ONAP).*

### Recent Experience

**Environmental Compliance.** Since 2001, Ms. Dymkoski has been the lead technical advisor to ICF staff regarding HUD's environmental review requirements (24 CFR Parts 50 and 58), NEPA, and the federal laws and authorities. She has provided her expert advice for a variety of projects across many jurisdictions using HOME, CDBG, NSP and other HUD funds. Her advisory work includes disaster recovery related work as well.

**Housing Program Implementation Strategy Advisory for the State of New Jersey, Department of Community Affairs, 2013–2014.** Ms. Dymkoski is a member of the ICF team of experts providing technical assistance for the implementation of the State of New Jersey's Community Development Block Grant Disaster Relief (CDBG-DR) funds. Her role is to utilize



her knowledge and expertise about HUD's environmental compliance requirements (24 CFR Part 58) and related environmental policies, the National Environmental Policy Act, and related federal laws and authorities to help develop policy and provide advice to the Department of Community Affairs (DCA), Department of Environmental Protection (DEP) and related state agencies regarding how to effectively implement and manage their environmental and historic review responsibilities. Her task includes providing advice on topics such as applicable federal environmental requirements; options for streamlining or coordinating the environmental review process and timeline; required compliance documentation; developing procedural documents, checklists or other tools; and guiding DCA and its partners on implementing its tiered environmental review process.

**New Jersey Disaster Relief Technical Assistance (TA), February 2013–May 2013.** Ms. Dymkoski was a member of the ICF team of experts providing technical assistance to the State of New Jersey on its recovery efforts using Community Development Block Grant Disaster Relief (CDBG-DR) funds that were provided by HUD following Superstorm Sandy. Her role was to utilize her knowledge and expertise about HUD's environmental compliance requirements (24 CFR Part 58) and related environmental policies, the National Environmental Policy Act, and related federal laws and authorities to provide advice to the DCA, DEP, and related state agencies regarding how to effectively implement their environmental and historic review responsibilities in the disaster setting.

**Environmental Review Guides (24 CFR Parts 50 and 58) and Training, 2001–Present.** Ms. Dymkoski has written many environmental review guides on HUD's environmental compliance requirements, describing the environmental review procedures and giving detailed steps for achieving compliance. She utilized her many years of experience as a trainer for both HUD and as a consultant to make the Federal environmental compliance requirements relevant and understandable. She also used knowledge she gained from her years of experience with HUD conducting environmental compliance monitoring to write these guides. She has also played a principal role in developing the training courses that accompany using these guides. Some examples include:

- **Training Course on *Environmental Review and the HOME Program*, 2004–Present.** Ms. Dymkoski played a principal role in developing a Part 58 environmental review training for the HUD Office of Block Grant Assistance that addressed the environmental compliance requirements for projects and activities receiving HOME Program funds. She was a key writer for the training manual and continues to provide updates as necessary. It's the most comprehensive training, to date, on Part 58 requirements related to the HOME Program. Ms. Dymkoski is also a principal trainer of this course and, on occasion, teaches the course without a co-trainer. ICF receives requests for training not only from HUD Field Offices but also from States administering HOME programs. For example, in 2011, the HUD Honolulu Field Office requested this training be provided to HOME participating jurisdictions, subrecipients, and Community Housing Development Organizations (CHDO) which that field office serves. And, in June 2013, Ms. Dymkoski was requested by the City of Orlando Housing Division to provide HOME environmental review training to its staff administering the HOME program, as well as staff administering its CDBG program.
- **Virginia Department of Housing and Community Development, HOME Environmental Review Procedures and Compliance Guide On 24 CFR 58, April 2012–Nov. 2012.** Ms. Dymkoski wrote a guide for the State of Virginia describing the environmental review





procedures and steps for achieving compliance for projects using HOME funds. She developed a training course featuring this guide, which she presented to the staff of the Virginia Department of Housing and Community Development.

**Technical Assistance.** Ms. Dymkoski is often called upon as an expert in HUD’s environmental compliance requirements, both 24 Part 50 and Part 58, to make comments and recommendations concerning environmental reviews prepared by HUD grantees. Her reviews focus on ensuring environmental procedures are being followed, including public notification and HUD approval when required, that the appropriate level of review was completed for the project or activity, and that environmental findings and conclusions are supported by written documentation. Her assistance in this area is across all HUD program lines. For example:

- **NSP2 On-Call Environmental Review Technical Assistance, 2010–2012.** The NSP2 nonprofit grantees that were not part of a consortium with a government partner were requested by HUD to facilitate HUD’s environmental compliance reviews (according to 24 CFR Part 50) by assembling an environmental review record (ERR) for approval by HUD. To assure nonprofits that environmental information they gathered met HUD’s needs for environmental compliance, grantees were required to submit their documentation to a technical assistance (TA) provider for comments and recommendations before they were permitted to submit the ERR to HUD for approval. Grantees’ TA requests were assigned by HUD to ICF, or to one of three other TA providers. There were two components to this technical assistance process: development of an environmental review guide for nonprofit grantees and HUD Regional/Field Environmental Officers (REO/FEO), and hands on review of grantees’ environmental records by TA providers.
- Ms. Dymkoski was the principal writer of the *Environmental Review Guide for Private Nonprofit Recipients of NSP2 Grants – 24 CFR 50* approved by HUD. The guidebook provided instructions to the grantees on the type of information they were to gather, the form in which it had to be presented to HUD, and the environmental clearance process to be followed from the time a project was identified to the time HUD authorized expenditure of project funds.
- In addition, Ms. Dymkoski led a team of ICF review staff that included junior, senior and quality control reviewers, as well as subject matter experts. She also provided general oversight of the NSP On-Call ER TA process by maintaining communications with the other TA providers to ensure consistency of the TA review process or to troubleshoot problem areas with HUD.

### Work History

Company	Position	Years
ICF	Expert Consultant	2001–Present
U.S. Department of Housing and Urban Development	Environmental Protection Specialist	1987–1999
U.S. Forest Service	Range Technician/Wildlife Biologist	1974–1987





## References

<b>Title of Project:</b> New Jersey Disaster Relief TA & Housing Program Implementation for CDBG-DR	
<b>Name:</b> ██████████ Deputy Commissioner, New Jersey Department of Community Affairs	<b>Phone:</b> ██████████0
<b>Address:</b> Trenton, New Jersey 08625-0800	<b>Email:</b> ██████████
<b>Title of Project:</b> New Jersey Disaster Relief TA & Housing Program Implementation for CDBG-DR	
<b>Name:</b> ██████████ Executive Asst., Office of Permit Coordination and Environmental Review, New Jersey Department of Environmental Protection	<b>Phone:</b> ██████████
<b>Address:</b> 401 East State Street, Trenton, NJ 08625	<b>Email:</b> ██████████
<b>Title of Project:</b> New Jersey Disaster Relief TA & NSP2 On-Call Environmental Review TA	
<b>Name:</b> ██████████, Director, Office of Environment and Energy, HUD	<b>Phone:</b> ██████████
<b>Address:</b> 451 7 <sup>th</sup> Street, SW, Washington, D.C. 20410	<b>Email:</b> ██████████
<b>Title of Project:</b> Environmental Training, City of Orlando Housing & Community Development Department	
<b>Name:</b> ██████████, Housing Division Manager, Housing Department, Housing and Community Development, City of Orlando	<b>Phone:</b> (██████████)
<b>Address:</b> 400 S. Orange Ave., Orlando, FL 32801	<b>Email:</b> ██████████@t
<b>Title of Project:</b> HOME Environmental Training, HUD Honolulu Field Office	
<b>Name:</b> ██████████, Director, Community Planning and Development, HUD	<b>Phone:</b> ██████████
<b>Address:</b> 1132 Bishop St., Ste. 1400, Honolulu, HI 96813-4918	<b>Email:</b> ██████████
<b>Title of Project:</b> Environmental Training, Virginia Department of Housing & Community Development	
<b>Name:</b> ██████████ Program Manager, Housing Department, Virginia Housing and Community Development	<b>Phone:</b> ██████████
<b>Address:</b> 600 E. Main Street, Suite 300, Richmond, VA 23219	██████████ ████████████████████



## Lizelle Espinosa

## ICF International

### Education

B.S., Government Administration, Christopher Newport University, Newport News, VA, 2000

### Trainings, Certifications, and Skills

- ISO 14001: 2004 Environmental Lead Auditor Training, Environmental Management Systems (EMS) (RABQSA), 2013
- Environmental Review and Compliance for Natural Gas Facilities, FERC Training Seminar, 2011
- How to Manage the NEPA Process and Write Effective NEPA Documents, The Shipley Group, 2008
- Occupational and Environmental Radiation Protection, Harvard School of Public Health, 2007
- Speaks Tagalog – basic speaking, writing, and reading

### Background

*Ms. Espinosa has nine years of experience in environmental consulting in the areas of environmental impact assessment, policy analysis, and regulatory compliance. She has provided consultancy services for clients in the private and public sectors, including consultancy support services to the Department of Energy (DOE) and Federal Aviation Administration (FAA). Ms. Espinosa assisted DOE's Office of Energy Efficiency and Renewable Energy in evaluating the potential environmental consequences of proposed project actions to determine whether such actions required preparation of categorical exclusions, environmental assessments, or environmental impact statements. For four years, she worked as a support contractor at the DOE Office of NEPA Policy and Compliance reviewing DOE NEPA documents and assisting in the preparation of DOE NEPA guidance documents. She assisted in writing articles for DOE's Lessons Learned publication, which provides guidance on the NEPA process for DOE and other agency NEPA staff. She provided technical assistance and NEPA support to the FAA's Office of Quality, Integration, and Executive Services' (AQS) Division of Quality, Integration, and Process Division which has oversight of the Aviation Safety (AVS) environmental policy, including management of AVS's Environmental Management System (EMS). Ms. Espinosa managed the annual budget and staff hours for the Part II section of DOE's Lessons Learned publication as well as the designated budgets for updates to the various Environmental Management Programs (EMPs) for FAA's AVS Service Offices. In addition, Ms. Espinosa served as Reference Manager for the most recent National Highway Transportation Safety Administration's (NHTSA) CAFE MY2017-2025 EIS and the Medium Duty and Heavy Duty Fuel Efficiency Improvement Program EIS. As Reference Manager, her responsibilities included managing the process of collecting and preparing the references and data to be delivered to NHTSA as part of the Administrative Records for both EISs.*

### Recent Experience

**Revision of the FAA NEPA Order 1050.1E and Development of NEPA Desk Reference,**



### **Federal Aviation Administration (FAA), 2013–2014.**

Assists with the revision of the FAA's NEPA implementing Order, FAA Order 1050.1E, and development of an accompanying Desk Reference to assist FAA Environmental Specialists with NEPA implementation. Attends frequent Work Group meetings consisting of representatives from the different lines of business and staff offices across the FAA. Participates in adjudication meeting preparation and support by drafting meeting materials, notes, and tracking action items and comment resolutions. Also works closely with ICF primary team members to develop strategies for the revised Order and write associated policy documents for the FAA.

**Environmental Compliance Program and Environmental Management Systems (EMS) Support, FAA, 2012–2013.** Served as On-Site Technical Support. Responsibilities included managing the Task Order budget and staff hours designated to ICF for updates to the EMPs. Provided research, analysis and technical support for the FAA's Office of Quality, Integration, and Executive Services' (AQS) Division of Quality, Integration, and Process Division (AQS- 100) which has oversight of the Aviation Safety Line of Business (AVS) environmental policy, including management of AVS's EMS. Assisted in preparing audit reports and conducting internal EMS audits of the various lines of business of AVS including the offices of Aircraft Certification Service, Flight Standards Service, and the Office of Quality, Integration, and Executive Services. Assisted with updating the AVS EMP and documentation/ initiatives associated with NEPA activities. Reviewed documents and provided assistance in addressing various NEPA and environmental compliance issues. Also provided support to update FAA AVS guidance and other informational documents.

### **National Renewable Energy Laboratory (NREL) NEPA Support for the State Energy Program (SEP) and Energy Efficiency and Conservation Block Grant (EECBG) Program for Formula and Competitive Block Grants, U.S. Department of Energy (DOE), 2010–2012.**

Served as On-Site Technical Support. Supported the DOE Golden Field Office with reviewing Energy Efficiency and Conservation Block Grant (EECBG) Program and State Energy Program (SEP) grant applications that were funded by the American Recovery and Reinvestment Act (ARRA). Reviewed applications and proposed projects from states and EECBG grants recipients, provided requests for more detailed or additional information from ARRA recipients, and provided guidance to DOE on making a NEPA determination (e.g. whether a proposed action can be categorically excluded or if an EA or EIS is warranted). The DOE Office of Energy Efficiency and Renewable Energy provided grants to state energy offices through the SEP and to various recipients of the EECBG program. States and the EECBG grants recipients used these grants to design and carry out their own renewable energy (solar, wind, biomass, geothermal) and energy efficiency programs. As part of the ARRA of 2009, the DOE SEP distributed approximately \$3.1 billion to the states and the DOE EECBG program distributed approximately \$3.2 billion awarded through formula and competitive block grants.

**EIS for the Corporate Average Fuel Economy Standards Passenger Cars and Light Trucks Model Years 2017-2025 Program, National Highway Transportation Safety Administration (NHTSA), 2011–2012.** Served as References Manager. Responsibilities included compiling the list of references used and cited in the various chapters of the EIS. Managed the process of collecting and preparing the data delivered to NHTSA as part of the EIS Administrative Record. Served as a contributing member of the air quality modeling team and participated in the air quality analysis of the climate change consequences of the proposed action. This EIS quantifies and explains the impact that the proposed fuel consumption and





GHG emission standards for passenger car and light truck vehicles built in the model years 2017-2025 will have on fuel consumption, criteria and toxic air pollutant emissions, greenhouse gas emissions, and global climate change.

**EA for the Heartland Community College Wind Energy, Normal, Mclean County, Illinois, DOE, 2011.** Assisted with the review of an EA for the DOE Office of Energy Efficiency and Renewable Energy regarding the design, construction and operation of a proposed wind turbine project on the Heartland Community College campus. Integrated various edits into the document and assisted in the review of the various potential impacts from the proposed wind turbine. Assisted in researching information and developing the cumulative impacts section for the EA.

**Cuyahoga County Agricultural Society Wind Energy Project EA, Kilowatts for Kenston Wind Energy Project, Pettisville Local Schools Wind Energy Project, and Archbold Area Local Schools Wind Energy Project, The Renaissance Group, Ohio—DOE, Ohio, 2011.** Assisted in the review of the various above mentioned EAs for the DOE Office of Energy Efficiency and Renewable Energy regarding the construction of the four proposed wind turbine projects in the state of Ohio. Integrated various edits into the documents and assisted in the review of the various potential impacts from the proposed wind turbines. Assisted in researching information, compiling the various appendices, as well as finalizing and technical editing of the documents in preparation of posting on the DOE Golden Field Office and Headquarters Public Reading Room websites.

**EIS for Medium Duty and Heavy Duty Fuel Efficiency Improvement Program, NHTSA, 2010–2011.** Served as References Manager. Responsibilities included compiling the list of references used and cited in the various chapters of the Draft and Final EIS. Managed the process of collecting and preparing the data to be delivered to NHTSA as part of the Draft and Final EIS Administrative Records. This EIS quantifies and explains the impact that the proposed fuel consumption and GHG emission standards for Heavy Duty vehicles built in the model years 2014-2018 will have on fuel consumption, criteria and toxic air pollutant emissions, greenhouse gas emissions, and global climate change.

**Lessons Learned Quarterly Reports (LLQR), Office of NEPA Policy and Compliance—DOE, 2004–2008.** Provided assistance to DOE in the development of the Lessons Learned quarterly publication. Responsibilities included managing the annual budget and staff hours for the Part II section of LLQR, writing articles, article research, and assisting with document production. Regularly assisted in editing the What Worked and What Didn't Work section of LLQR. Also compiled cost information and input regarding various EAs, EISs, and supplement analyses.





## Work History

Company	Position	Years
ICF	Senior Associate	2010–Present
Dade Moeller & Associates, Inc.	Environmental Analyst	2003–2010
U.S. Investigations Services, Inc.	Field Investigator	2002–2003
Kaufman and Canoles, P.C.	Legal Assistant	2001–2002
Towers Perrin	Associate	2001

## References

<b>Title of Project:</b> Environmental Compliance Program and Environmental Management Systems (EMS) Support for the Federal Aviation Administration (FAA) Aviation Safety (AVS) Line of Business—FAA, Nationwide, United States		
<b>Name:</b> [REDACTED]	<b>Phone:</b> [REDACTED]	
<b>Address:</b> 800 Independence Ave. SW, Washington, D.C. 20591	<b>Email:</b> [REDACTED]	
<b>Title of Project:</b> National Renewable Energy Laboratory (NREL) NEPA Support for the State Energy Program (SEP) and Energy Efficiency and Conservation Block Grant (EECBG) Program for Formula and Competitive Block Grants, DOE		
<b>Name:</b> [REDACTED]	<b>Phone:</b> [REDACTED]	
<b>Address:</b> U.S. DOE, 1000 Independence Ave. SW, GC-54, Washington, D.C. 20585	<b>Email:</b> [REDACTED]	
<b>Title of Project:</b> EA for the Heartland Community College Wind Energy, Normal, Mclean County, Illinois, DOE		
<b>Name:</b> [REDACTED]	<b>Phone:</b> [REDACTED]	
<b>Address:</b> U.S. DOE, 1000 Independence Ave. SW, GC-54, Washington, D.C. 20585	<b>Email:</b> [REDACTED]	
<b>Title of Project:</b> EIS for the Corporate Average Fuel Economy Standards Passenger Cars and Light Trucks Model Years 2017-2025 Program, NHTSA		
<b>Name:</b> [REDACTED]	<b>Phone:</b> [REDACTED]	
<b>Address:</b> Department of Transportation, National Highway Traffic Safety Administration, 1200 New Jersey Ave., SE, Washington, D.C. 20590	<b>Email:</b> [REDACTED]	
<b>Title of Project:</b> EIS for Medium Duty and Heavy Duty Fuel Efficiency Improvement Program, NHTSA		
<b>Name:</b> [REDACTED]	<b>Phone:</b> [REDACTED]	
<b>Address:</b> Department of Transportation, National Highway Traffic Safety Administration, 1200 New Jersey Ave., SE, Washington, D.C. 20590	<b>Email:</b> [REDACTED]	



<b>Title of Project:</b> Cuyahoga County Agricultural Society Wind Energy Project EA, Kilowatts for Kenston Wind Energy Project, Pettisville Local Schools Wind Energy Project, and Archbold Area Local Schools Wind Energy Project, The Renaissance Group – DOE	
<b>Name:</b> [REDACTED]	<b>Phone:</b> [REDACTED]
<b>Address:</b> U.S. DOE, Golden Field Office, 1617 Cole Blvd., Golden, CO 80401	<b>Email:</b> [REDACTED]
<b>Title of Project:</b> Lessons Learned Quarterly Reports, Office of NEPA Policy and Compliance – DOE	
<b>Name:</b> [REDACTED]	<b>Phone:</b> [REDACTED]
<b>Address:</b> U.S. DOE, 1000 Independence Ave. SW, GC-54, Washington, D.C. 20585	<b>Email:</b> [REDACTED]



## John Hansel, JD

ICF International

### Education

JD (cum laude), Washington College of Law, American University, Washington, D.C., 1982  
BA, Economics, University of Wisconsin-Madison, 1968

### Background

*John Hansel is an accomplished environmental attorney and environmental protection specialist. With 38 years of experience in developing and managing environmental protection programs and policies, he has proven abilities in addressing controversial environmental issues from various perspectives—from policymaking, training, and implementation oversight to project-level environmental impact analyses and negotiations. John is an expert on NEPA implementation and related environmental impact analysis requirements. He has provided NEPA compliance advice as a Federal employee and a consultant and has conducted peer reviews on some of ICF's most complex and unique EISs. These EISs have covered such major federal actions as transporting spent nuclear fuel to the Yucca Mountain repository, establishing the nation's next set of corporate fuel economy standards, expanding the strategic petroleum reserve, allowing the genetic modification of alfalfa, permitting the Rockies East natural gas transmission pipeline, financing alternative forms of energy production, and streamlining the processing of experimental permit applications for the launch and reentry of reusable suborbital rockets. As an accomplished trainer and facilitator, he has prepared and led environmental training seminars for HUD grantees, other federal agencies, and ICF staff that address NEPA implementation and the full range of other environmental impact review requirements.*

### Recent Experience

**Training Course on Environmental Reviews for HUD Assisted Projects—HUD Office of Native American Programs, Nationwide, June 2006 to March 2013.** Mr. Hansel prepared and delivered portions of the training course on HUD's environmental compliance requirements (24 CFR Parts 50 and 58) for projects receiving Indian Housing Block Grant and Indian Community Development Block Grant funds. The course was offered nationwide.

**NEPA Support—Michigan State Housing Development Authority (MSHDA), HUD, November 2011–January 2013.** Mr. Hansel participated in environmental technical assistance support to the MSHDA under a contract with HUD. The work involves technical assistance for projects receiving Neighborhood Stabilization grant funds from HUD. He provided guidance on compliance with HUD's environmental regulations to MSHDA and twelve Michigan communities.

**NEPA Support—U.S. Department of Justice, Office of Justice Programs, Nationwide, January 2006–September 2013.** Served as NEPA compliance reviewer. Mr. Hansel assisted in the preparation and review of more than 100 EAs and over 100 categorical exclusions for proposed new and expanded prisons, juvenile detention facilities, and other projects receiving Federal grant funds across the United States. He also assisted grantees with evaluating NEPA requirements, consulting with federal agencies and State Historic Preservation Officers, and ensuring compliance with applicable regulations. Grantees included state agencies, county and city police forces, corrections agencies, and tribes.





**NEPA Support to the Loan Guarantee Program Office—DOE, Washington, D.C., June 2009 to August 2011.** Served as NEPA compliance reviewer for NEPA support to the DOE Loan Programs Office. Reviewed applications submitted pursuant to fossil energy advanced technologies, energy efficiency, renewable energy and advanced transmission technologies, nuclear power, front-end nuclear fuel cycle, and advanced technology vehicles. Worked closely with DOE to provide expert assessment of the adequacy of the environmental information in loan guarantee applications to assist applicants and their environmental contractors in preparing robust NEPA documents. Reviewed the subsequent NEPA document, checking for overall NEPA compliance with CEQ and DOE NEPA implementing regulations; performing quality assurance reviews of the NEPA document to ensure accuracy, consistency, and that analyses are replicable and well documented; and performing independent verification of the analyses.

### Work History

Company	Position	Years
ICF	Senior Environmental Specialist	2006-Present
U.S. Department of Commerce, National Oceanic and Atmospheric Administration, National Marine Fisheries Service	NEPA Coordinator	2002-2006
U.S. Department of Justice	Senior Environmental Attorney	1998-2002
Resolution Trust Corporation and Federal Deposit Insurance Corporation	Senior Environmental Specialist	1990-1998
Farmers Home Administration	Environmental Specialist	1979-1990
U.S. Department of Commerce, Economic Development Administration	Environmental Protection Officer	1971-1979

### References

<b>Title of Project:</b> Training Course on Environmental Reviews for HUD-Assisted Projects	
<b>Name:</b> [REDACTED]	<b>Phone:</b> [REDACTED]
<b>Address:</b> Office of Native American Programs, U.S. Department of Housing and Urban Development	<b>Email:</b> [REDACTED]
<b>Title of Project:</b> NEPA Support—Michigan State Housing Development Authority (MSHDA)	
<b>Name:</b> [REDACTED]	<b>Phone:</b> [REDACTED]
<b>Address:</b> Michigan State Housing Development Authority, 735 E. Michigan Ave, P.O. Box 30044, Lansing, MI, 48909	<b>Email:</b> [REDACTED]
<b>Title of Project:</b> NEPA Support—U.S. Department of Justice, Office of Justice Programs	
<b>Name:</b> [REDACTED] NEPA Manager	<b>Phone:</b> [REDACTED]
<b>Address:</b> Bureau of Justice Assistance, Office of Justice Programs, 810 Seventh Street NW, Washington, D.C. 20531	<b>Email:</b> [REDACTED]
<b>Title of Project:</b> NEPA Support to the Loan Programs Office—DOE	
<b>Name:</b> [REDACTED]	<b>Phone:</b> [REDACTED]
<b>Address:</b> U.S. Department of Energy, Loan Programs Office, 1000 Independence Ave., SW, Washington, D.C. 20585	<b>Email:</b> [REDACTED]





## Christine Hartmann, P.E., PMP

ICF International

### Education

M.Eng, Environmental Engineering, University of Maryland, College Park, MD, 2000  
B.S., Civil Engineering – Environmental Core, University of Maryland, College Park, MD, 1993

### Background

*Ms. Hartmann is a licensed Professional Engineer (P.E.) and certified Project Management Professional (PMP) with 20 years of experience in program and project management; environmental engineering; regulatory compliance auditing; due diligence reporting; regulatory guidance, interpretation, application and reporting; program development, implementation and management; and design and construction management.*

*Ms. Hartmann provides complete National Environmental Policy Act (NEPA) program support including preparing scopes of work, budgets, managing and conducting site visits, collecting and interpreting data, evaluating potential environmental impacts, developing mitigation recommendations, and preparing NEPA determination documents, including Categorical Exclusions (CXs), Environmental Assessments (EAs) with Findings of No Significant Impact (FONSIs), and Environmental Impact Statements (EISs) with Records of Decision (RODs) for private clients pursuing mergers and acquisitions, and for Federal clients conducting major federal actions and/or pursuing privatization of Federal facilities and components thereof. All NEPA determinations include assessing the proposed action for compliance with relevant statutes and orders, including but not limited to, the Clean Air Act, the Clean Water Act, the Coastal Zone Management Act, the Endangered Species Act, the National Historic Preservation Act (Section 106), as well as Executive Orders including Environmental Justice for Minorities (EO 12898) and Protection of Children (EO 13045). Additional NEPA support includes NEPA programs, policies and procedures development and implementation, along with development of training materials, guidance documents, and reference tools.*

### Recent Experience

#### **NEPA Project Management Support to Federal Emergency Management Agency (FEMA), Environmental Planning and Historic Preservation Office (OEHP), 2010–2013.**

Ms. Hartmann provided project management and NEPA guidance to FEMA OEHP for the National Flood Insurance Program (NFIP) Environmental Impact Statement (EIS), and V-Zone Rule Revision Environmental Assessment (EA). The NFIP EIS involves assessment of the impact of the NFIP on construction in the floodplain and recovery in the floodplain after catastrophic flood events have occurred, with evaluations conducted at the national level and at the community level. The V-Zone EA involves assessment of the impact of revising the rule banning construction and rebuilding in the coastal velocity zone (V-Zone). Ms. Hartmann served as the Project Manager on this nationwide project.

#### **NEPA Project Support to Michigan State Housing Development Authority (MSHDA), November 2011–Present.**

Ms. Hartmann has provided environmental technical assistance support to the Michigan State Housing Development Authority under a contract with HUD. Efforts involve providing technical assistance for projects receiving Neighborhood Stabilization Program (NSP) grant funds from HUD, including: reviewing Environmental Assessments (EAs) prepared by grant applicants, associated Phase I and Phase II environmental due diligence



documentation, and providing subject matter expertise related to site contamination and remediation of hazardous constituents.

**Storage Tank Regulation Review and Research Support to Department of Housing and Urban Development (HUD), Neighborhood Stabilization Program, Office of Community Planning and Development, 2011–2012.** Efforts included review of existing HUD Regulation 24 CFR Part 51 Subpart C and the HUD guidebook “Siting of HUD-Assisted Projects Near Hazardous Facilities” and identification of potential areas for reevaluation and improvement. Specific topics researched include the identification of storage tank features and fire suppression systems to mitigate hazards, development of acceptable separation distances (ASDs) from HUD-assisted projects for specific storage tanks, pipelines, and their contents (liquid or gas), identification and assessment of the components of fuel cell storage tanks and how they may be regulated, and the identification and assessment of the components of storage silos and their propensity for explosions. The information and data gathered under this task order was presented to HUD in topic-specific reports and fact sheet format for use in making informed decisions on how to best improve applicable regulations, and to provide consistent best management practice guidance to their grantees with respect to project design and safety.

**NEPA Support for Grant Program, Department of Energy (DOE), 2009–2010.** As described below, Ms. Hartmann served multiple support roles to DOE’s Energy Efficiency and Renewable Energy (EERE) Division as an on- and off-site NEPA Review Specialist and Strategic Planner in both Washington, D.C., and DOE headquarters, and in Golden, Colorado, at the DOE Field Office.

- **Energy Efficiency and Conservation Block Grant (EECBG) Program SWAT Team NEPA Reviewer.** Served as part of a four member ICF Team of NEPA Specialists assisting the EERE Office of Weatherization and Intergovernmental Program (OWIP) with the NEPA evaluation of thousands of EECBG applications to fund energy efficiency and renewable energy projects throughout the U.S. and its territories –pursuant to the American Recovery and Reinvestment Act (ARRA). Primary duties include evaluation of proposed actions (projects) for consistency with eligibility criteria, assessment of the level of project details and environmental impact details presented in the application and environmental questionnaire materials, consideration of potential extraordinary circumstances associated with the proposed action, identification of data deficiencies and coordination with applicants to ensure submittal of appropriate follow-up or supplemental information, assisting applicants with understanding the NEPA process, development of NEPA training materials for OWIP managers to share with applicants, making and drafting initial NEPA determination recommendations for projects that met DOE categorical exclusion criteria (10 CFR Part 1021, Appendices A & B to Subpart D), preparing written recommendations if a higher level of NEPA analysis was warranted, and coordinating with the appropriate DOE NEPA Compliance Officer (NCO) on all final NEPA determinations. In addition to project evaluation, continuous tracking of completed and outstanding reviews was maintained for reporting purposes. Review documents were maintained in accordance with the NEPA administrative record for each application.
- **On-Site NEPA Reviewer.** While assigned to the DOE Golden Field Office (GO), Ms. Hartmann served as a part of a multi-member ICF Team of NEPA Specialists assisting GO NEPA staff with project reviews similar to those performed as part of the EECBG SWAT



Team. Applicants being processed through GO were receiving grant funds in excess of \$2M. Responsibilities included daily NEPA support of projects assigned to specific OWIP EECBG and State Energy Program project officers. In addition to reviewing and evaluating grant materials, Ms. Hartmann participated in teleconferences with applicants to evaluate progress and assist with project modification suggestions to ensure project eligibility and NEPA clearance. She and the ICF team maintained NEPA review status information and documents for relevant projects with the GO Project Management Center (PMC) database, and provide status reports to GO and OWIP on a weekly basis. In addition to preparing NEPA determinations, Ms. Hartmann drafted agency consultation letters for GO NCO signature.

- NEPA Shadow Document Manager.** While assigned to DOE headquarters, Ms. Hartmann served as a NEPA Shadow Document Manager assisting the assigned DOE NEPA Document Manager and NCO with the preparation for, and implementation and completion of, multiple EAs for EERE-funded wind energy projects. Responsibilities included development of project schedules in consultation with the contractor retained to prepare the EA, determining resource areas to be evaluated under NEPA, preparing public notice materials and stakeholder lists, preparing the Purpose & Need and Project Description sections of the EAs, preparing template language for remaining EA sections to guide expedited contractor preparation of the EA, identifying the need and bringing in subject matter experts when warranted to assist with the evaluation of critical resource areas such as noise and biological resources, scheduling and leading status meetings, coordinating internal review of contractor prepared draft documents by the primary DOE NEPA team and DOE General Counsel (GC-54 Office of NEPA Policy and Compliance, and GC-51), assisting with addressing public comments within the EA and preparing responses to public comments, and preparing the Final EA with Finding of No Significant Impact (FONSI).

**Environmental Programs Management Support, U.S. Environmental Protection Agency (EPA), 2005–2008.** As the Environmental Programs Manager for the Architecture, Engineering and Asset Management Branch (AEAMB) within the EPA Facilities Management and Services Division (FMSD), Ms. Hartmann led and directed the National Environmental Policy Act (NEPA), Environmental Due Diligence Process (EDDP), Permit Review, and Preserve America work for this client nationwide. Daily management efforts included providing program and project planning, milestone scheduling, budgeting, task execution, quality assurance/quality control (QA/QC), client briefings, and reporting and documentation across all programs. Sample projects managed and performed for EPA AEAMB include:

- EPA NEPA Program review and revision based on 40 CFR Part 6 Final Ruling.** Efforts include the update of existing management program, revision of guidance documents, and creation of new guidance tools for use by EPA project managers at the headquarters (HQ) level and Facility Managers coordinating major federal actions.
- EPA Facilities Manual, NEPA Chapter.** Efforts include development of concise desk top reference chapter and how-to guide for managing and implementing the NEPA review process for use by EPA project managers at the HQ level and Facility Managers coordinating major federal actions.
- EPA Chelmsford All Hazards Receipt Facility (AHRF) EA.** Efforts include conducting site visits; data collection and document review; environmental impacts assessment; public outreach and inclusion; inter-agency coordination with EPA, DHS, DOD, and FBI; and





development of the EA and FONSI for the AHRF located at the EPA Region 1 Laboratory in Chelmsford, Massachusetts. The operational intent of the AHRF is to accept and analyze field samples originating from domestic and/or international terrorist incidents, and is the first facility of its kind to undergo the NEPA review process. A second “sister” AHRF is slated for implementation in New York State.

**Environmental Programs Management Support, Office of the Architect of the Capitol (AOC), 2006–2008.** Ms. Hartmann supported the Environmental Branch (EB) within the AOC’s Safety & Environmental Division (S&ED) as Program Manager/Lead Project Manager on the contract. In this capacity, Ms. Hartmann managed over 40 task orders ranging from program and policy development, planning and implementation, to environmental compliance auditing, to management program assessment, to program/policy/procedure gap analyses, to training materials development. As the Lead Project Manager for AOC EB, projects managed and worked include program, policy, and guidance document development; underground storage tank program management, to include conducting field assessments and regulatory compliance audits and developing Spill Prevention, Control and Countermeasures (SPCC) Plans; preparing Title V Operating Permit applications (pursuant to the Clean Air Act [CAA]) and industrial wastewater discharge notifications (pursuant to the National Pollutant Discharge Elimination System [NPDES]); conducting program evaluations and data gap analyses, and communicating findings; developing training programs and materials; and conducting comprehensive environmental compliance audits with formal reporting and recommendations for improvement and/or compliance attainment and maintenance for 40 facilities on the Capitol Complex and in the District of Columbia, Maryland and Virginia (to include the Capitol, Senate and House Office Buildings, Supreme Court and Library of Congress Buildings, etc.). Compliance audits for AOC EB consisted of site documentation research and review, physical site inspections, onsite employee interviews, and interviews with facility managers, environmental staff and senior program managers. Comprehensive environmental compliance audit program development included defining audit program methodologies and practices; developing, planning, budgeting, scheduling, conducting, and reporting of all facility audits; and communicating audit findings in concise reporting tools for ease in execution and tracking of follow-up Action Items by responsible parties.

### Work History

Company	Position	Years
ICF	Senior Manager	2009–Present
Booz Allen Hamilton	Associate	2005–2008
Environmental Resources Management	Project Manager	2001–2004
Maryland Environmental Service	Public Health Engineer III	1994–2001

### References

Title of Project: NEPA Project Management Support, FEMA OEHP	
<b>Name:</b> ██████████	<b>Phone:</b> ██████████
<b>Address:</b> DHS/FEMA/FIMA, Office of Environmental Planning and Historic Preservation, 1800 South Bell Street, Arlington, VA 20585	<b>Email:</b> ██████████





<b>Title of Project: NEPA Project Support, MSHDA</b>	
<b>Name:</b> [REDACTED]	<b>Phone:</b> [REDACTED]
<b>Address:</b> Michigan State Housing Development Authority, 735 E. Michigan Ave, P.O. Box 30044, Lansing, MI, 48909	
<b>Title of Project: Regulation Review and Research Support, HUD</b>	
<b>Name:</b> [REDACTED]	<b>Phone:</b> [REDACTED]
<b>Address:</b> HUD, Environment and Energy Division, 451 7 <sup>th</sup> Street SW, Room 7248, Washington, D.C. 20410	
<b>Title of Project: NEPA Support for Grant Program, DOE</b>	
<b>Name:</b> [REDACTED]	<b>Phone:</b> [REDACTED]
<b>Address:</b> U.S. Department of Energy, Golden Field Office, 1617 Cole Boulevard, Golden, CO 80401-3393	
<b>Title of Project: Environmental Programs Management Support, U.S. EPA</b>	
<b>Name:</b> [REDACTED]	<b>Phone:</b> [REDACTED]
<b>Address:</b> U.S. EPA HQ, Architecture, Engineering and Asset Management Branch, Ariel Rios Building, 1200 Pennsylvania Ave, NW, Mail Code 3204R, Washington, D.C. 20460	
<b>Title of Project: Environmental Programs Management Support, AOC</b>	
<b>Name:</b> [REDACTED]	<b>Phone:</b> [REDACTED]
<b>Address:</b> Architect of the Capitol, Safety & Environment Division, Ford House Office Building, 5 <sup>th</sup> Floor, 411 D Street, NW, Washington, D.C. 20024	



## Aleida Johnson

## ICF International

### Certifications and Training

- Records Management Certification
- Credits toward Bachelor's Degree in Business (110 of 123)
- Title Insurance Certification

### Background

*Ms. Johnson has over 15 years of experience in data research, reporting, field management and MIS Initiatives. Over her 15 years of professional experience, she has become a valued and well respected team member and cross-trainer who excels in multi-site management, process improvement, and process turnaround. She has a proven track record for developing professional and personal relationships and works well with all levels of staff from junior to senior-level management. Ms. Johnson is highly organized, experienced in working in a fast-paced, competitive environment. Most recently, she supported a large records clean-up across 21 business units, applying retention schedules and coding to ensure compliance of internal and external regulations under generally accepted records principals (GARP). She developed and led a two day workshop on Records Coordination and has experience across many software platforms including Microsoft Office 2010, Unix, Iron Mountain IM-Connect, E-memory, Exx-Image, and Reflections.*

### Recent Experience

**ExxonMobil Research and Engineering Co., Clinton, NJ, Records Management Project Consultant, August 2011–January 2013.** Ms. Johnson was contracted to help support a large records clean-up project that spanned 21 business units, over 50k offsite records covering a period of more than 60 years. Ms. Johnson was responsible for identification, filtering, indexing and updating of records to ensure proper retention schedules and coding meet generally accepted records principles (GARP). Ms. Johnson conducted searches using Cuadra Star Unix system and created large excel reports for each individual business unit. Ms. Johnson provided a leadership role in creating the Records Management Policies and Procedures and developed a two day workshop on Records Coordination which was attended by dozens of staff.

**SMART Business Advisory and Consulting, Devon, PA, Project Manager/Team Lead, December 2009–July 2011.** Ms. Johnson supported the assessment of business records for 18 municipalities including, reorganizing, indexing and coding of pertinent data and purging expired records in anticipation of a new Records Information Management (RIM) System. While working at SMART, Ms. Johnson was routinely recognized for her high level of productivity and knowledge in the area of records retention. Ms. Johnson also assisted in the hiring process of 10 staff members and supported the NJ DARM records retention schedules.

**Charles Jones, Trenton, NJ, Field Manager, 1997–2006.** As a Field Manager, Ms. Johnson trained, mentored, and managed a staff of six field representatives covering a 26 county territory. Ms. Johnson was responsible for developing individual and group performance goals, conducting performance reviews and monitoring progress in the field. Ms. Johnson and her team identified whether the property was subject to liens, had judgments or unpaid real estate taxes, as well as other information necessary for a clear title transfer. Ms. Johnson developed



new procedures to research information needed to support real-estate closings which resulted in a 60% reduction in research time and greatly decreased the need for local travel. Ms. Johnson conceptualized a new position, In-House Research Manager to provide oversight of time sensitive research which was accepted by management. During her time at Charles Jones, Ms. Johnson was consistently ranked as a Top Performer amongst eight of her peers. Ms. Johnson was noted for her attention to detail, having only 2 claims out of more than 30,000 investigations.

### Work History

Company	Position	Years
ExxonMobil Research and Engineering Co.	Records Mgmt Project Consultant	2011–2013
SMART Business Advisory and Consulting	Project Manager	2009–2011
Charles Jones	Field Manager	1997–2006

### References

<b>Title of Project:</b> ExxonMobil Research and Engineering Co.	
<b>Name:</b> [REDACTED]	<b>Phone:</b> [REDACTED]
<b>Address:</b> 436 Springfield Ave, Summit, NJ 07901	<b>Email:</b> [REDACTED]
<b>Title of Project:</b> SMART Business Advisory and Consulting, now Grant Thornton, LLP	
<b>Name:</b> [REDACTED]	<b>Phone:</b> [REDACTED]
<b>Address:</b> 2001 Market St., Suite 3100, Philadelphia, PA 192001	<b>Email:</b> [REDACTED]
<b>Title of Project:</b> Charles Jones	
<b>Name:</b> [REDACTED]	<b>Phone:</b> [REDACTED]
<b>Address:</b> 3600 Horizon Blvd, Suite 300, Philadelphia, PA 19053	<b>Email:</b> [REDACTED]





## Benjieve Joseph

ICF International

### Education

MS, Data Analytics, SNHU, Currently Undergoing

Masters of Computer Application, Bharathidasan University, India, 1996

Bachelors in Computer Science, Bharathiar University, India, 1992

### Background

*Mr. Joseph has more than 19yrs of experience in the IT Industry with expertise in data management, datawarehousing/business intelligence, enterprise architecture, process engineering and management, and infrastructure architecture/engineering. He has experience leading various initiatives in the data management space. Notable ones include the consolidation of reference data across systems at both Fannie Mae and NSF (Success measures included bringing down BI related integrity issues and reduced reference data duplication across the organization), implemented PII (or NPI) specific controls to meet privacy and security guidelines at FannieMae and NSF. Another initiative underway at NSF is to consolidate master data for key business processes (Grants) with the end goal of performing Master Data Management.*

### Recent Experience

**Information Architect, Enterprise Data Warehouse and Business Intelligence Program managed by ICF International for National Science Foundation , 2012-Current.** Worked with the Enterprise Architecture team to setup the EDBI(Enterprise Data Warehouse and Business Intelligence) program. Created a reference architecture for data management at the Enterprise level and was instrumental in setting up the technical team for target state execution. Worked with various Directorates/Divisions at NSF to bring them aboard the EDBI platform using the Data Readiness Assessment (DRA) process. Stabilized an existing program that was more concentrated towards targeted operational reporting and shifted the focus towards a holistic data analytics and visualization solution. Helped architect the technical infrastructure for all three layers (BI, ETL and Data Warehouse). He was also part of the EA team providing necessary recommendations on NSF's key initiatives (notable one included the data integration approach for their financial application iTrak)

**Data Analyst/Solutions Architect/Database Administrator/Data Operations Lead, FannieMae 2003- 2012.** Mr. Joseph Held several roles during his tenure at FannieMae. He was part of the core architecture group and his contributions enormously helped reach 100% automation in the Automated Underwriting and Acquisitions DataWarehouse. This was also supported by lean processes to support the complex data management platform that had live data feeds, hourly batches and complex processing requirements to meet a 6a SLAs every day. Ben architected the first ever Data Quality framework at FannieMae and also provided a custom front-end to expose the results that was a key SOX Compliance artifact. The Data Quality framework was of large value for the business team who were able to identify and sort out data quality issues that could have resulted in large financial impacts and good will. He also contributed to the overall architecture, design and development of the DW space. He was also part of the SOX Compliance initiative and was instrumental in securing the infrastructure and





applications to meet requirements. These controls also made sure that NPI(Non-Public Information) data was safe and secure. He was also called into action following an internal NPI data breach on another part of the enterprise. His analysis skills and business acumen helped that specific business unit to identify a total of 23 systems including 2 external systems and necessary remediation was also put in place. Ben was a part of the Data and BI COE(Center of Excellence). He has also conducted several proof of concepts to optimize technology and process level issues.

### Work History

Company	Position	Years
ICF	Technical Specialist	2013-Present
Armo International	Consultant	2012-2013
Fannie Mae	Data Operations Lead	2006-2012
OST International	Consultant	2001-2006
Cybercom International	Consultant	2000-2001
FEC Infosystems, Singapore	Consultant	1999-2000
Polaris Software Labs, Chennai, India	Systems Engineer	1998-1999
DataVision, Coimbatore, India	Sr. Programmer Analyst	1998
DaraFolks Computer Consultants, India	Analyst/Developer	1995-1998

### References

<b>Title of Project:</b> Enterprise Data Warehouse and Business Intelligence Program		
<b>Name:</b> ██████████ EDBI Program Lead – DIS, NSF	<b>Phone:</b> ██████████	
<b>Address:</b> National Science Foundation, 4201 Wilson Blvd. Arlington, VA 22230	<b>Email:</b> ██████████	
<b>Title of Project:</b> Enterprise Data Warehouse and Business Intelligence Program		
<b>Name:</b> ██████████, EDBI Program Manager – DIS, NSF	<b>Phone:</b> ██████████	
<b>Address:</b> National Science Foundation, 4201 Wilson Blvd. Arlington, VA 22230	<b>Email:</b> ██████████	
<b>Title of Project:</b> Data Analyst/Solutions Architect/Database Administrator/Data Operations Lead		
<b>Name:</b> ██████████, Director Single Family Mortgage Business	<b>Phone:</b> ██████████	
<b>Address:</b> Fannie Mae, 3900 Wisconsin Ave, NW, Washington, DC 20016	<b>Email:</b> ██████████	
<b>Title of Project:</b> Data Analyst/Solutions Architect/Database Administrator/Data Operations Lead		
<b>Name:</b> ██████████, Sr. Manager Single Family Acquisitions Technology	<b>Phone:</b> ██████████	
<b>Address:</b> Fannie Mae, 3900 Wisconsin Ave, NW, Washington, DC 20016	<b>Email:</b> ██████████	



## Gary McGowan

## Cultural Preservation & Restoration, Inc.

### Education

M.A., Museum Studies, Archaeological Conservation, State University of New York, New York, NY, 1988

B.A., Fine Arts, Sculpture, Philadelphia College of Art, Philadelphia, PA, 1985

### Background

*Mr. McGowan is Cultural Preservation & Restoration's (CPR) Principal Conservator and has more than 25 years of experience with a wide range of archaeological materials. Mr. McGowan has received the distinction of Professional Associate within the American Institute for Conservation of Historic and Artistic Works (AIC). His projects have included prehistoric and historic sites in the New York area as well as sites in New Jersey, Pennsylvania, and Delaware. Mr. McGowan worked on many of the collections that were excavated in lower Manhattan in the 1970's and 1980's. As Principal Conservator & Laboratory Director he developed, equipped and directed the Foley Square archaeology laboratory and the conservation of the cultural materials recovered from the 18th century African Burial Ground and 19th century Five Points sites. Mr. McGowan conserved seven earthen sculpted faces from the Wesleyan Methodist Church in Syracuse, New York, that was a documented stop on the Underground Railroad. This artwork is believed to have been created by runaway slaves fleeing to Canada. Additional projects include the conservation of materials from the HMB, Sloop DeBraak, an 18th century British brig-class ship; several historic cemeteries; survey of Morris Canal turbine assembly incline Plane #9. Mr. McGowan has professional affiliations with the Professional Archaeologists of New York City, the New York State Archaeological Association, the Society for Historic Archaeology, and the Council for Northeast Historic Archaeology. Mr. McGowan has worked with county, municipal, historical societies and governmental agency representatives to develop protocols for in-situ preservation/stabilization evaluating the archaeological resource, developing and implementing long-term stabilization and curation of archaeological collections. In addition, Mr. McGowan has co-authored two books, *Breaking Ground, Breaking Silence – The Story of New York's African Burial Ground and Freedoms Road*, as well as presenting at many professional archaeological and conservation conferences since 1989.*

### Recent Experience

**Hurricane Sandy Cultural Heritage Disaster Response. Bergen County Historical Society. 2012–Present.** Collections recovery, condition assessment of materials impacted by Hurricane Sandy. Developed and implemented a preservation plan and long-term curation guidelines.

**Manhattan Development Project: Compliance Archaeology for Redevelopment Plan for Upper West Side, New York, NY. Geoarcheology Research Associates, 2013.** Selected organic artifacts chosen for archaeological conservation, long-term curation and display.

**Nomads and Networks: The Ancient Art and Culture of Kazakhstan. Institute for the Study of the Ancient World (ISAW) – NYU, 2012.** Repaired and reconstructed selected artifacts on exhibition at ISAW.

**19<sup>th</sup> Century Assemblage Contract Archaeology Mitigation Due to Development Project. McCormack Taylor, 2011.** Conservation of selected archaeological objects.



**City Hall Park Archaeological Project. Chrysalis Archaeological Consultants. 2011–Present.** Conservation of 18<sup>th</sup> century artifacts and series of late 18<sup>th</sup> early 19<sup>th</sup> century wooden water main pipes recovered from several archaeological projects, as part of a larger archaeological impact study of lower Manhattan, with oversight by Landmarks Preservation Commission, New York, NY.

**Conservation. Department of Environmental Protection (DEP) City of New York, NY. 2011.** Conservation of wooden water main pipes from Beekman Avenue.

**World Trade Center Redevelopment Project. AKRF, Inc., 2010–2011.** Provided site visit, condition assessment of selected artifacts from the redevelopment of World Trade Center Site. Project included the condition assessment and field excavation recommendations for the recovery and long-term preservation of wooden ship remains as part of a historic land filling episode. Other organic and inorganic objects were also treated as part of a conservation effort. Wood identification, object analysis and microscopy were also carried out on unique objects. Project was carried out for Port Authority and complied to both SHP.O. and Landmarks Preservation guidelines following a 106 Historic Preservation Plan.

**Raritan Landing Project. New Jersey State Museum, 2010.** Conservation and stabilization of archaeological collection from Raritan Landing.

**Dann Archaeological Collection. State Museum of New York, 2007–2009.** Conservation of historic and prehistoric Native American and European artifacts.

**Conservation. City of Wilmington, Delaware, 2008.** Conservation of 19<sup>th</sup> century wooden water main pipes.

**Conservation. National Park Service, 2008.** Conservation of historic wooden well pump.

**Conservation. Division of Historical and Cultural Affairs, DE, 2007–2008.** Conservation of artifacts from Roosevelt Island Inlet, Lewes, DE.

**Conservation. Rock Hall Museum, Lawrence, NY. 2004.** Conservation/stabilization of an archaeological feature.

**St. John's House. Historic St. Mary's City Commission, 2003.** Stabilization and consolidation of two 17<sup>th</sup> century brick chimney foundations from the former house called St. John's, St. Mary's City, MD.

**Foley Square Archaeological Project (Five Points and African Burial Ground Sites), NY. General Services Administration (GSA), Contract Archaeological Firm: HCI and John Milner Associates, 1992–1998.**

- The archaeological investigation of the Five Points Site for GSA consisted of 850,000 artifacts from the late 18<sup>th</sup> through 19<sup>th</sup> century. The collection was surveyed to evaluate overall physical and chemical stability of the artifacts. A triage conservation protocol was developed and implemented to stabilize this vast collection. The materials treated included copper alloy and other metallic objects, and organic materials such as wood and leather. The conservation lab was designed and equipped, a variety of analytical testing was performed to aid in the analysis of the collection, large databases of conservation treatments and digitized images of the artifacts were created and maintained, and educational





programs on the role of the conservator were developed. Analysis of collection included working with analytical chemists and research scientists for SEM/EDS analysis of glass beads; Auger electron spectroscopy (AES) analysis of soils, bricks and ceramic glass; prepared soil samples for DNA pilot testing for infectious diseases such as cholera, TB and yellow fever from archaeological contexts; and emission spectrographic analysis of selected metal artifacts.

- The African Burial Ground Site consists of 560,000 artifacts from the 18<sup>th</sup> century. Additionally, 420 human skeletal remains were recovered. The same methodology was implemented where applicable as in the Five Points Site. In addition, an in-depth protocol was developed for the transportation for the skeletal remains to Howard University for further analysis. The fragile skeletal remains required an innovative approach to safeguard their integrity and maintain their analytical potential. The conservation team in consort with ARTEX art handlers successfully transported these rare and sacred remains. Finally, at the end of the project, human remains and cultural materials associated with these individuals were reinterred at the site.

### Work History

Company	Position	Years
Cultural Preservation & Restoration, Inc.	Principal Conservator	1992–Present
John Milner Associates	Archaeological Conservator, Lab Director	1991–1996
South Street Seaport Museum	Senior Conservator and Lab Director Archaeology	1990–1992
Louis Berger International	Conservator	1989–1990
South Street Seaport Museum	Archaeological Conservator	1988–1989
Shiqmim Site, Northern Negev, Israel	Field Conservation-Archaeology	1987

### References

<b>Title of Project:</b> City Hall Park Archaeological Project	
<b>Name:</b> ██████████, President/Owner, Chrysalis Archaeological Consultants, Inc.	<b>Phone:</b> ██████████
<b>Address:</b> 4110 Quentin Rd, Brooklyn, NY 11234	<b>Email:</b> ██████████
<b>Title of Project:</b> Manhattan Development Project	
<b>Name:</b> ██████████, President/Owner, Georcheology Research Assoc.	<b>Phone:</b> ██████████
<b>Address:</b> 92 Main St, Suite 207, Yonkers, NY 10701	<b>Email:</b> ██████████
<b>Title of Project:</b> World Trade Center Redevelopment Project	
<b>Name:</b> ██████████, Senior Archaeologist, AKRF, Inc.	<b>Phone:</b> ██████████
<b>Address:</b> 440 Park Avenue South, New York, NY 10016	<b>Email:</b> ██████████





## Kelly Price

## ICF International

### Education

Coursework towards M.U.P., The University of Virginia & Virginia Tech (Joint Program), Northern Virginia Campus, 1997–1999  
 B.S., College of Charleston, Charleston, SC, 1991

### Background

*Ms. Price is a Senior Fellow with ICF with over 23 years of professional experience in planning and housing and community development programs. Ms. Price has an undergraduate degree from the College of Charleston (SC) in Urban Studies and completed significant coursework towards a Masters of Urban Planning at the joint program of the University of Virginia and VirginiaTech. She worked in the public sector for six years prior to joining ICF in 1996. She has hands-on expertise in planning, development, implementation and monitoring of housing and community development activities at the local level. In these positions, Ms. Price oversaw housing and community development programs funded by a variety of sources. Ms. Price currently manages large, multi-task technical assistance (TA) projects for the U.S. Department of Housing and Urban Development and other state and local clients. Ms. Price also provides direct TA to states and localities on HOME, CDBG and the Neighborhood Stabilization Program (NSP), as well as planning processes, program design, disaster recovery and environmental review. In addition, Ms. Price designs and delivers training courses across the country on a wide range of HUD's housing and community development programs and effective program design and implementation topics.*

### Recent Experience

**OneCPD Technical Assistance.** As the Housing and Community Development Group's Technical Assistance Team Leader, Ms. Price currently manages millions of dollars of TA grant funding from HUD. She supervises a TA support team to ensure that work plans, budgets, and reporting are all carried out in a timely, compliant and efficient manner. She also oversees all project teams (currently 15) on individual TA engagements to ensure that all engagements and deliverables are of the highest quality. Topics for these engagements range from organizational development to financial management to program redesign, and involve teams of highly skilled subject matter experts whose activities must be coordinated. Several of these engagements are very large, highly complex and high profile as in Cook County and Chicago IL, Providence RI, and Somerville MA. Currently assisting with the development of several written products and tools for grantees and the public to better understand and utilize CPD programs.

**CDBG and NSP Technical Assistance.** Ms. Price provides direct TA to CDBG and NSP funded states, counties and cities. For example, she provided TA to the State of South Carolina and Commonwealth of Kentucky on those states' CDBG programs, including crafting and updating program procedures and training staff on the program rules and procedures. Ms. Price helped South Carolina with initial program design and policy issues regarding its NSP1 funding. She also wrote the State of Arkansas NSP policies/operations manual, single and multi-family NSP applications and developed and delivered training to potential NSP applicants. Ms. Price worked with Kentucky's NSP program to design and deliver implementation training, provide guidance on NSP forms, written agreements and other implementation tools and adapt the



state's CDBG handbook for NSP purposes. She also oversees millions of dollars in TA activities and is on project teams providing TA to high risk NSP grantees such as the State of Michigan (general policy and environmental review), Cook County (program implementation) and Chicago IL (program implementation) and numerous other states and localities. Work includes intensive TA on CDBG & NSP requirements and policies, program design, legal agreements, underwriting, program administration and tracking, environmental review and marketing and sales to homebuyers. Delivered several national webinars on NSP topics such as Section 3 and environmental review and participated in NSP roundtable clinics.

**Disaster Recovery Technical Assistance.** Provided in-depth technical assistance on planning, design and implementation of disaster recovery programs to several communities affected by natural disasters including Arkadelphia, AR, and Midwest City and Oklahoma City, OK. For these communities, analyzed the housing and/or commercial markets, designed housing repair and rebuilding programs, helped secure waivers of program regulations and to form public-private partnerships and secure funding, and developed strategic plans and processes for local implementation of the recovery programs. Also conducted needs assessments of several communities hit by natural disasters, including Little Rock and Bebe, AR, Moore and Choctaw, OK, to determine technical assistance needs and action plans for long-term recovery. Served policy advisor on the Louisiana CDBG-DR Disaster Recovery program, providing guidance and training on CDBG and other requirements such and Section 3 and environmental review, particularly to the multi-family rental development (Piggyback program) team. Ms. Price recently provided guidance to the states of Kentucky and New York on the use of CDBG-DR funding for certain types of recovery activities.

**KY CDBG Handbook and Certified Administrator Testing and Training Program, 2002–Present.** Led the team that totally re-wrote and enhance the Commonwealth of Kentucky's CDBG Administrators Handbook and developed the state's first official CDBG Certified Administrator testing program. Annually update the handbook and related program tools for the State. Develop curricula and deliver multiple annual training sessions, including training for new administrators to become certified and training on specialized advance topics for already certified individuals. Also, developed new CDBG monitoring systems that included an Microsoft Access database, checklists and a handbook for KY CDBG staff. Also conducted training for grantees on compliance. Also led a small team that provided start-up guidance to KY on its NSP including policy TA and several training sessions across the state. She updates the handbook and provides multiple trainings annually in addition to on-call policy guidance.

**South Carolina Department of Commerce, 2000–Present.** Updated and revised the state's CDBG Implementation Manual and Resource Manual. Each year, design and deliver an annual trainings for state recipients and administrators on the implementation of CDBG-funded projects and special topics such as timeliness, rehabilitation management, procurement and environmental review. Also helped guide the State through a major program redesign, providing ongoing policy and implementation support. Continues to provide training annually for state grantees on various CDBG and related topics.

**Arkansas Development Finance Agency, 2009–Present.** Under our ongoing work with ADFA, on a team that updated the existing ADFA HOME Program manual utilized by all state recipients to ensure consistency with Federal regulations. Developed and delivered a certification training to state HOME recipients and partners. Provided TA to ADFA on its Neighborhood Stabilization



Program (NSP), providing single and multi-family request for proposals and conducting training on program requirements.

**Michigan State Housing Development Authority, 2010–Present.** Manage a team of senior TA providers in assisting MSHDA, which has the largest amount of NSP funding in the country (over \$500m). Provide overall project management and support, policy guidance and troubleshooting. Provided direct TA on a range of environmental issues and topics.

**Other State and Local Environmental TA.** Under various HUD TA grants and direct state/local contracts, have provided guidance on preparation of 24 CFR Part 58 compliance environmental reviews and other related topics and issues. Clients have included: State of Virginia; Seminole County, FL; State of Alaska; Sommerville, MA; Cook County, IL; Indianapolis, IN; and others.

### Relevant Publications and Presentations

- *HOME and Environmental Review.* For HUD, co-wrote and periodically update the training curricula that detail the requirements and process of complying with 24 CFR Part 58 environmental review requirements.
- Council of State Community Development Agencies (COSCDA) 2013 Southern Regional Conference. Conducted a presentation for 17-state conference on environmental review, specifically recent policy updates and strategies to obtain more efficiency in the process.
- National Council of State Housing Agencies (NCSHA) 2009, 2010 & 2011. Developed and presented training on various topics as they relate to state agency HOME program design and implementation including monitoring and environmental review.
- *Basically CDBG.* Co-wrote and periodically update the comprehensive training and resource manual for HUD's Office of Entitlement Programs, February 1998 - present.
- *CDBG and Subrecipients.* For the New York HUD Office, co-wrote a training manual, February 1998.
- *Building HOME: A HOME Program Primer.* Co-wrote and periodically update the comprehensive training and resource manual on the HOME Program for HUD's Office of Affordable Housing Programs, June 1997 - present.
- *HOME Program Update.* Developed training package on HOME Program Final Rule for HUD's Office of Affordable Housing Programs, June 1997.
- *CHDOs and HOME.* Co-wrote participant training manual for various HUD offices, September 1997.
- *Designing Homeownership Programs and Working with Lenders.* For HUD's New Jersey Office, co-developed a comprehensive training manual, November 1997.
- *Arkadelphia, Arkansas Disaster Recovery Program and Housing Market Analysis.* Under contract with HUD, co-wrote market study and recovery plan for a small town devastated by a tornado, May 1999.
- *Technical Guide for Determining Income and Allowances under the HOME Program – Second Edition.* Re-wrote guidebook for HUD's Office of Affordable Housing Programs (HUD-1780-CPD), June 1999.





- *Homeownership Options under the HOME Program: A Model for Publicly Held Properties and Land Trusts.* Updated and edited guide for HUD's Office of Affordable Housing Programs (HUD-1781-CPD), June 1999.
- *Financing Rental Housing under the HOME Program.* Re-wrote guidebook for HUD's Office of Affordable Housing Programs (HUD-1794-CPD), January 2000.

### Work History

Company	Position	Years
ICF	Senior Fellow	2012–Present
	Vice President	2002–2012
	Project Manager	1999–2002
	Senior Associate	1997–1999
	Associate	1996–1997
City of Alexandria, VA, Office of Housing	Housing Analyst	1994–1996
City of Charleston, SC, Department of Housing & Community Development	Deputy Director	1993–1994
	Projects Officer	1992–1993
	Specialist	1991–1992
The Ben Silver Corporation	Manager	1989–1991

### References

<b>Title of Project:</b> OneCPD Technical Assistance	
<b>Name:</b> ██████████ Director, Office of Technical Assistance, U.S. Department of Housing and Urban Development	<b>Phone:</b> ██████████
<b>Address:</b> 451 7th Street S.W., Washington, D.C. 20410	<b>Email:</b> ██████████
<b>Title of Project:</b> NSP Technical Assistance (all)	
<b>Name:</b> ██████████, Office of Block Grant Assistance, Neighborhood Stabilization Program, U.S. Department of Housing and Urban Development	<b>Phone:</b> ██████████
<b>Address:</b> 451 7th Street S.W., Washington, D.C. 20410	<b>Email:</b> ██████████
<b>Title of Project:</b> Kentucky CDBG Handbooks, Training, TA, etc.	
<b>Name:</b> ██████████, Director, Office of Federal Grants, Department for Local Government, Commonwealth of Kentucky	<b>Phone:</b> (██████████)
<b>Address:</b> 1024 Capital Center Dr., Frankfort KY	<b>Email:</b> ██████████
<b>Title of Project:</b> HOME Technical Assistance (all)	
<b>Name:</b> ██████████ Director, Office of Affordable Housing Programs, U.S. Department of Housing and Urban Development	<b>Phone:</b> ██████████
<b>Address:</b> 451 7th Street S.W., Washington, D.C. 20410	<b>Email:</b> ██████████





<b>Title of Project: SC CDBG (all projects)</b>	
<b>Name:</b> [REDACTED]	<b>Phone:</b> [REDACTED]
<b>Address:</b> 1201 Main Street, Suite 1600, Columbia, SC 29201-3200	<b>Email:</b> [REDACTED]
<b>Title of Project: Community Development Technical Assistance (CDTA)</b>	
<b>Name:</b> See CDBG and HOME TA above (direct client contact retired)	<b>Phone:</b> NA
<b>Address:</b> NA	<b>Email:</b> NA
<b>Title of Project: CDBG DR TA (multiple projects)</b>	
<b>Name:</b> [REDACTED], Deputy Director, Office of Block Grant Assistance, U.S. Department of Housing and Urban Development	<b>Phone:</b> [REDACTED]
<b>Address:</b> 451 7th Street S.W., Washington, D.C. 20410	<b>Email:</b> [REDACTED]



## Kenneth Rock

## ICF International

### Education

M.B.A., Public Management and Finance, Stanford Graduate School of Business, 1985  
 M.S., Applied Earth Sciences, Stanford University, 1977  
 B.S., General Engineering, Stanford University, 1977

### Certifications and Training

- Certified Project Management Professional (PMP), Number 1259515, 2009
- FEMA Incident Command System Training, Levels 100 – 400
- FEMA Certificates of Achievement: Radiological Emergency Preparedness Exercise Evaluation, Public Assistance Program, and Coordinating Environmental and Historic Compliance

### Background

*Mr. Rock has more than 25 years consulting and program management experience in the areas of emergency management, environmental assessment, strategic planning, and training. His public-sector experience includes diverse projects for FEMA, the Environmental Protection Agency, and the Department of Defense (DoD). He has supported FEMA on disasters in Florida and North Carolina and served as FEMA's lead environmental contractor for public assistance programs in coastal North Carolina counties affected by Hurricane Floyd. Mr. Rock supported FEMA's efforts to update its cost estimating methods and was selected by FEMA to review appeals of funding decisions submitted by applicants to FEMA headquarters and prepare decision letters for signature by the Director. He also is the sole or principal author of numerous environmental assessments for FEMA and DoD. For the Missile Defense Agency, Mr. Rock led strategic planning efforts for MDA's environmental management program and developed a portal-based environmental awareness training course that became a requirement for more than 8,500 employees and contractors.*

### Recent Experience

**Hazard Mitigation Planning, Miami-Dade County, Florida, 2000–2001.** Wrote successful proposals and managed a multidisciplinary program to prepare local mitigation strategies for 11 municipalities in Miami-Dade County, Florida, including the City of Miami. Analyzed vulnerabilities to natural disasters, such as hurricanes and floods, and identified mitigation measures to reduce potential damages. Developed a quantitative methodology for analyzing risks and establishing priorities for alternative projects to reduce risks. This step-by-step methodology was used by Miami-Dade County to prioritize projects for more than \$250 million of mitigation efforts. Served on the Local Mitigation Strategy Steering Committee in Miami-Dade County, Florida. Provided policy guidance and leadership for participating communities to assist them in developing local mitigation strategies.

**Hurricane Floyd (DR-1292-NC) Disaster Support, Eastern North Carolina, 1999.** Served as FEMA's lead environmental support contractor for public assistance efforts in the eastern coastal North Carolina counties most affected by Hurricane Floyd. Identified environmental and historical issues requiring coordination with Federal and state regulatory agencies and initiated appropriate contacts. Met with dozens of public sector applicants, conducted site inspections,



discussed eligibility issues with project officers, reviewed project worksheets, and completed environmental reviews for repairs to more than 300 damaged public buildings and infrastructure facilities. Received commendation letters from Kyle Mills, FEMA VI Regional Environmental Officer (November 4, 1999) and Howard Wilson, FEMA Public Assistance Coordinator.

**Hurricane Georges (DR-1249-FL) Disaster Support, Florida, 1998.** Provided environmental and historic preservation support to FEMA's Public Assistance Program. Assessed damages to bridges and culverts in the Panhandle counties of Florida, coordinated with the U.S. Fish and Wildlife Service when required, and reviewed project worksheets to identify potential environmental and historic preservation issues.

**Hurricane Andrew (DR-955-FL) Closeout Team, FEMA, 1997.** Worked with a small FEMA headquarters team to resolve longstanding contentious projects and allow closeout of FEMA's Hurricane Andrew Disaster Field Office in Miami. Key concerns included eligibility of work on historical structures and museums, damages to buried ocean outfalls, and undocumented repairs performed after the disaster. These unusual cases required creative solutions that the team provided in all cases to achieve successful resolution. Received commendation from Mark Merritt, FEMA Deputy Chief of Staff, Office of the Director (December 1, 1997) in recognition of outstanding TAC III Support for Hurricane Andrew.

**Geology and Hydrology Support for Analysis the Bristol Bay, Alaska Watershed Assessment, Environmental Protection Agency, 2011–Present.** Currently reviewing background documents and providing comments to EPA in the areas of geology, hydrology, and mitigation to support EPA's efforts to understand the potential environmental effects of mining a world-class mineral deposit in an environmentally sensitive area. Key issues are acid rock drainage, surface water and groundwater contamination, and impacts to fish populations. Served as contributing author to the Draft Assessment.

**Environmental Management Program, Missile Defense Agency (MDA), 2001–2011.** Provided environmental compliance assistance to support development of the nation's ballistic missile defense system. Served as lead environmental coordinator for several MDA programs, including the airborne laser, the Patriot missile, and the Arrow interceptor. Coordinated extensively with legal counsel and public affairs staff to ensure proper communication of agency plans. Worked closely with installation personnel nationwide to ensure that missile test programs took place as planned with a minimum risk of environmental litigation. Received letters of appreciation and commendations from program management and executive staff.

**Reclamation Cost Estimating, EPA's Office of Resource Conservation and Recovery, 2010–Present.** Identified issues and costs associated with mine reclamation and remediation and evaluated potential financial responsibility requirements for the hardrock mining industry under CERCLA 108(b). Led reviews of eight mine reclamation cost estimates and related environmental studies to assess scope, quality, and consistency of the proposed mining, reclamation, and restoration plans with regulatory requirements. Several of the mines required funding for long-term water quality management and treatment in perpetuity.

**Environmental Assessments (EAs) of Post-Disaster Recovery Projects, FEMA, 1998–2001.** Sole or principal author of EAs for FEMA in accordance with requirements of FEMA regional offices and NEPA. Coordinated consultations among federal and state agencies, conducted site visits, and identified mitigation measures for incorporation into project design to reduce potentially significant adverse environmental effects. Specific EAs and key issues associated with each are described below.

- **EA for Merrill Stevens Docks and Boatyard, Miami, Florida.** Removal of pilings and





rehabilitation of seawalls after the facility was destroyed by Hurricane Andrew. Key issues were protection of endangered manatees and minimizing effects on benthic biota.

- **EA for Public Works Storage Facility, Sisseton, South Dakota.** Construction of a new public building to replace a storage facility damaged by heavy snowfall. Key issues were traffic and public safety.
- **EA for James Valley Christian School, Huron, South Dakota.** Demolition of a school destroyed by floods and construction of a new school. Key issues included loss of prime farmland, minimizing impacts on wetlands, and avoiding impacts to known archaeological sites.
- **EA for Relocation of John Redd Road, Calhoun County, Florida.** Moving a dirt road adjacent to the Apalachicola River to a location less susceptible to repetitive damages. This project required an Individual Permit from the Corps of Engineers and incorporation of design measures to minimize effects on sensitive wetlands.
- **EA for New Police Building, Carolina Beach, North Carolina.** Construction of a new police facility to replace a building destroyed by Hurricane Bonnie. Key issues included avoidance of potential impacts to wetlands, potential disturbance to known Civil War artifacts, and traffic.
- **EA for Public Beach Cabana, Oak Island, North Carolina.** Reconstruction of a boardwalk, restroom, and parking facilities extensively damaged by Hurricane Floyd. Key issues included public safety, public safety, and potential impacts on endangered sea turtles.
- **EA for Mid-East Housing Facility, Pitt County, North Carolina.** Construction of new low-income housing units on a new site out of the 100-year floodplain. Key issues included socioeconomics, traffic, and public safety and health.

**Environmental Management Program, MDA, 2001–2011.** Led strategic planning efforts for MDA’s environmental management program. Solicited input from a broad variety of stakeholders and used a systematic approach to identify key goals, objectives, and performance measures. Obtained plan approval by senior agency leadership.

**Environmental Awareness Training, MDA, 2002–2010.** Developed a general environmental awareness training course that was posted on MDA’s web portal. This required agency-wide training became required training for more than 8,500 MDA employees and contractors. Revised the training in 2010 to include executive order requirements (EO 13514) for sustainable buildings, sustainable electronics, green procurement, energy and water conservation, and fleet management.

### Work History

Company	Position	Years
ICF	Project Manager, Senior Project Manager	1996–Present
SCIENTECH, Inc.	Senior Environmental Engineer, Project Manager	1993–1996
OGDEN Environmental	Director of Business Development, DOE Programs	1991–1993
Gordon Associates	Director of Environmental Engineering	1989–1991
ICF	Senior Environmental Engineer	1986–1989





Price Waterhouse Government Services	Manager	1985–1986
Earth Metrics	Environmental Engineer, Senior Staff Scientist	1977–1983

## References

<b>Title of Project:</b> Hazard Mitigation Planning, Miami-Dade County, Florida		
<b>Name:</b> [REDACTED], Deputy Chief, Fire Rescue Operations	<b>Phone:</b> [REDACTED]	
<b>Address:</b> Broward County, FL		
<b>Title of Project:</b> Hurricane Floyd (DR-1292-NC) Disaster Support, Eastern North Carolina		
<b>Name:</b> [REDACTED], former FEMA Region VI Environmental Officer	<b>Phone:</b> [REDACTED]	<b>Email:</b> [REDACTED]
<b>Title of Project:</b> Hurricane George (DR-1249-FL) Disaster Support, Florida		
<b>Name:</b> [REDACTED], FEMA Region IV Environmental Officer	[REDACTED]	[REDACTED]
<b>Title of Project:</b> Hurricane Andrew (DR-955-FL) Closeout Team, FEMA		
<b>Name:</b> [REDACTED], Senior Vice President Recovery	<b>Phone:</b> [REDACTED] 0	
<b>Address:</b> Witt O'Brien's, 1501 M Street, NW, Washington, D.C. 20005		
<b>Title of Project:</b> Geology and Hydrology Support for Analysis the Bristol Bay, Alaska Watershed Assessment, Environmental Protection Agency		
<b>Name:</b> [REDACTED] Acting Associate Director for Ecology, National Center for Environmental Assessment, Office of Research and Development, U.S. Environmental Protection Agency	<b>Phone:</b> [REDACTED]	
<b>Address:</b> 1200 Pennsylvania Avenue, SW (8623-P), Washington, D.C. 20460	<b>Email:</b> [REDACTED]	
<b>Title of Project:</b> Environmental Management Program, Missile Defense Agency (MDA)		
<b>Name:</b> [REDACTED]; MDA Facilities, MILCON, & Environmental Management	<b>Phone:</b> [REDACTED]	[REDACTED]
<b>Title of Project:</b> Reclamation Cost Estimating, EPA's Office of Resource Conservation and Recovery		
<b>Name:</b> [REDACTED] EPA Office of Resource Conservation and Recovery	<b>Phone:</b> [REDACTED]	[REDACTED]
<b>Title of Project:</b> Environmental Assessments (EAs) of Post-disaster Recovery Projects, FEMA		
<b>Name:</b> [REDACTED] FEMA Region IV Environmental Officer	<b>Phone:</b> [REDACTED]	[REDACTED]
<b>Title of Project:</b> Environmental Management Program, MDA		
<b>Name:</b> [REDACTED], COR; MDA Facilities, MILCON, & Environmental Management	<b>Phone:</b> [REDACTED]	[REDACTED]
<b>Title of Project:</b> Environmental Awareness Training, MDA		
<b>Name:</b> [REDACTED], COR; MDA Facilities, MILCON, & Environmental Management	<b>Phone:</b> [REDACTED]	[REDACTED]



## Elizabeth Tick

## ICF International

### Education

Master of Science, Public Policy and Management, H. John Heinz III School of Public Policy & Management, Carnegie Mellon University, Pittsburgh, Pennsylvania, 2008

Bachelor of Science, Zoology, Michigan State University, East Lansing, Michigan, 2005

### Background

*Ms. Elizabeth Tick received her Master's degree from Carnegie Mellon University where she studied public policy with a focus on environmental policy and economics. Ms. Tick has strong written and verbal communication skills, has experience writing about technical issues in plain English, has developed and delivered trainings and presentations, and is comfortable conducting financial, economic, regulatory, and program analyses. At ICF, Ms. Tick provides regulatory analysis, development, and program support for a variety of federal agencies, including the Headquarters U.S. Marine Corps (HQMC), Environmental Protection Agency (EPA), Nuclear Regulatory Commission (NRC), Department of Transportation (DOT), Department of Justice (DOJ), Department of Homeland Security (DHS), Department of Labor (DOL), Department of Health and Human Services (DHHS), Centers for Disease Control (CD.C.), Federal Motor Carriers Administration (FMCSA), Transportation Security Administration (TSA), Federal Emergency Management Agency (FEMA), and U.S. Department of Agriculture (USDA).*

### Recent Experience

**Camp Lejeune Historic Drinking Water (CLHDW), Headquarters U.S. Marine Corps (HQMC), 2012–Present.** Ms. Tick is working on site at the Pentagon for HQMC supporting its public outreach and risk communication efforts for the CLHDW Program. The CLHDW Program was developed by HQMC to identify, communicate, and assist Marines, Sailors, civilian employees, and their families whose health may have been affected by on-base contaminated drinking water from 1957 to 1987. The program also supports efforts by independent scientific organizations (Agency for Toxic Substances and Disease Registry [ATSDR] and National Academies' National Research Council [NRC]) in their research into whether diseases and disorders experienced by former residents and workers are or are not associated with their exposure to contaminated water at Camp Lejeune. Contaminants in the drinking water included solvents used in dry cleaning and degreasing operations (trichloroethylene [TCE] and perchloroethylene [PCE]), as well as benzene and other volatile organic compounds.

Ms. Tick had to ramp up on a controversial and complex project and become an expert about a very technical, scientific, and political subject. She had to quickly become familiar with ICF's call center capabilities and has become comfortable with risk communication techniques and water contamination processes and contaminants. Ms. Tick is coordinating efforts between HQMC and the CLHDW Call Center, staffed by ICF. This includes managing the public messages the Call Center is delivering during calls and when responding to letters and emails to mirror those being given by HQMC. Ms. Tick is also managing the letter and email correspondence to ensure these inquiries are being responded to in a timely fashion. To ensure consistency in procedures within the Call Center, Ms. Tick developed an approximately 100-page standard operating procedure for the Call Center that outlines its duties and responsibilities in a step by step



outline. She also developed screen captures and other images to visually present the procedures of each task. Ms. Tick manages the tasks conducted by the call center and ensures quality products are being developed.

Ms. Tick is developing weekly briefs that summarize CLHDW program issues, media updates, social media updates, legal issues, CLHDW Call Center activities, and other relevant program status updates. She is reviewing and summarizing technical memorandums and scientific studies and developing briefs to communicate the information to U.S. Marine Corps senior leadership and management. Ms. Tick is also preparing technical memorandums, congressional responses, media responses, and other responses to inquiries from concerned constituents.

**Connecticut Department of Housing (DOH) Community Development Block Grant – Disaster Relief (CDBG-DR) Grant Program, 2013–Present.** Ms. Tick is Deputy Project Manager for the CT CDBG-DR Grant Program and was also proposal lead for the \$1.2 million contract. She is managing ICF's implementation of DOH's CDBG-DR intake/application process. This includes managing the development of an online application, and support for applicants throughout the life of the application process. She has developed weekly updates to keep the client apprised of the status of the applications in the database.

The online application collects sufficient information for the State to determine eligibility of each applicant and evaluate the relative priority of the applicant in accordance with those priorities established by the State. Ms. Tick is coordinating the development of the database with the ICF IT team and the client to ensure client satisfaction with the structure and contents of the database including updates to the system as the project has progressed. Once an applicant has determined their application is complete, their application undergoes a QA/QC process to ensure all needed information has been provided and properly uploaded. If all information has been provided, the application is submitted to DOH. Ms. Tick is coordinating the QA/QC process and keeping the State apprised of the status of each application.

The project also required that ICF open five Intake Centers along the coastline of Connecticut. Two static intake centers in each of the two targeted counties (Fairfield and New Haven), and one static intake center in one of the two other eligible counties (Middlesex and New London). Ms. Tick identified all five locations and managed the staffing and training of the Intake Center Counselors and Intake Center Managers. Ms. Tick also worked with the IT group to establish and obtain the necessary equipment (computers, scanners, copiers, and printers) for the Intake Centers to assist Connecticut citizens in filling out the grant application at the Intake Centers or through mobile units. She also worked with the Call Center to develop call scripts to assist in the information dissemination to applicants about the status of the applications.

**Sustainable Design and Green Building Toolkit for Local Governments, EPA, 2009 – 2010.**

Ms. Tick developed a self-evaluation methodology document for municipalities to review their permitting process and determine if barriers to green building and green construction exist. The document was developed to help municipalities identify any problematic code provisions in areas including: the building structure, energy use, zoning, site development, construction materials management, demolition materials management, construction site air emissions, stormwater management during construction and post construction, and land revitalization. Another goal of the methodology was to help communities identify any green construction practices that may be permissible under the codes but nevertheless face resistance in the





permitting process, and to also develop a approach to assessing new practices and removing such resistance where appropriate. The documents utilized to develop this worksheet include LEED 2009 for New Construction and Major Renovation and The International Green Construction Code.

### Work History

Company	Position	Years
ICF	Senior Associate	2010-present
	Associate	2008-2010
Pennsylvania Angel Network	Environmental Fellow	2007-2008
National Science Foundation, Office of Inspector General	Management Analyst Intern	2007
Pittsburgh Department of City Planning	Compliance Intern	2007
University of Michigan Marine Hydrodynamic Laboratory	Lab Assistant	2005-2006

### References

<b>Title of Project:</b> Camp Lejeune Historic Drinking Water (CLHDW)	
<b>Name:</b> [REDACTED]	<b>Phone:</b> [REDACTED]
<b>Address:</b> Headquarters Marine Corps 3000 Marine Corps Pentagon, Room 2D153A Washington, D.C. 20350-3000	<b>Email:</b> [REDACTED]
<b>Title of Project:</b> DOH CDBG-DR Grant Program	
<b>Name:</b> [REDACTED]	<b>Phone:</b> [REDACTED]
<b>Address:</b> Connecticut Department of Housing 505 Hudson Street Hartford, CT 06106	<b>Email:</b> [REDACTED]
<b>Title of Project:</b> Sustainable Design and Green Building Toolkit for Local Governments	
<b>Name:</b> [REDACTED]	<b>Phone:</b> [REDACTED]
<b>Address:</b> EPA Region 4 61 Forsyth St SW Atlanta, GA 30303	<b>Email:</b> [REDACTED]





## 7. Experience on Contracts of Similar Size and Scope

As described in Tab 5, ICF has been assisting clients in all areas of the proposed Scope of Work for more than 30 years, and have more than four decades of experience assisting clients in implementing the requirements of NEPA. The table below lists 26 projects similar to the broad range of tasks

envisioned under this contract. We included these projects as a demonstration of the depth of our expertise. The following pages provide descriptions of the projects in the order listed and include two client contacts for each project. We also list the key managers involved in these projects who will be available to support DEP on the proposed contract.

**EXHIBIT 7-1 OVERVIEW OF SIMILAR CONTRACTS**

Project Name	Environmental Reviews	Historic Preservation	HUD and Disaster Recovery	IT/Data Management	Program Management
State of New Jersey CDBG-DR Environmental Support	✓	✓	✓	✓	✓
California Weatherization Assistance Program	✓	✓		✓	✓
NEPA and Section 106 Technical Assistance to MSHDA	✓	✓	✓		✓
Broadband Initiatives Program	✓			✓	✓
NEPA Support for Office of Justice Programs	✓		✓		✓
NEPA Support for Department of Energy	✓				✓
State of Louisiana CDBG Disaster Recovery Program	✓	✓	✓	✓	✓
Tehachapi Renewable Transmission Project (TRTP)	✓				✓
NSP2 On-Call Environmental Review TA	✓		✓		✓
FEMA Radiological Emergency Preparedness (REP)				✓	✓
Connecticut CDBG-DR Program Implementation	✓		✓	✓	✓
Environmental Review for Pennsylvania CDBG-DR Buyout Program	✓		✓		
MacArthur Park Apartments NEPA EA	✓				
Skid Row Housing Trust Skid Row Housing Project	✓				
NEPA Categorical Exclusion and Section 106 Review for City of Los Angeles	✓	✓	✓		
2401 Jefferson Boulevard HUD EA	✓	✓			
HUD Section 106 Consultant for City of Los Angeles	✓	✓			
HUD's Noise and Storage Tank Regulations	✓		✓		
National and Local HOME Community Development TA	✓		✓		
Kentucky CDBG Handbook, Training and TA	✓		✓		
South Carolina CDBG Handbook, Training and TA	✓		✓		
New York State CDBG-DR TA	✓	✓	✓		
Somerville MA HUD Environmental Review TA	✓	✓	✓		
Environmental Reviews HUD-Assisted Projects Training	✓		✓		
Evolut Health Office 365 Implementation				✓	
E-Filing for the Federal Trade Commission				✓	



State of New Jersey CDBG-DR Environmental Support				
<b>Professional Services:</b>				
CDBG	HUD	NEPA	Section 106	
✓	✓	✓	✓	
<b>Client:</b>				
State of NJ CDBG-DR for DCA Technical Assistance, U.S. Department of Housing and Urban Development				
<b>Client Reference:</b>				
<p>██████████ New Jersey Department of Environmental Protection ██████████</p> <p>██████████ HUD Environmental Officer ██████████</p>				
<b>Period of Performance</b>				
January 2013 – May 2013 (HUD TA)				
May 2013 – Present (NJ DCA)				
<b>Key Staff:</b> Scott Ledford, Neil Sullivan, Cathy Dymkoski, Richard Starzak				
<b>Project Relevance to this Program:</b>				<p>Our proposed Project Manager, Scott Ledford, and his team have provided guidance to DCA and DEP on compliance with HUD's environmental regulations and helped DEP establish a strategy for compliance for each of the 17 Action Plan programs.</p>
<b>Description of Work:</b>				<p>ICF has been providing technical assistance for environmental reviews to DCA, DEP, and Economic Development Authority. This work started under a Technical Assistance contract with HUD and has continued under a direct contract with the State of New Jersey. Work involves providing guidance on compliance with HUD's environmental regulations at 24 CFR Part 58 for the first \$1.8 billion of Hurricane Sandy relief funding. Under this contract ICF has provided the following services:</p> <ul style="list-style-type: none"> <li>▪ ICF provided guidance to DCA and DEP on compliance with HUD's environmental regulations at 24 CFR Part 58. This guidance started at the kickoff meeting in Trenton with an initial introduction to the requirements of Part 58, the types of environmental documentation, and the process that needs to be followed through to request for release of funds.</li> <li>▪ ICF provided guidance on the Tiered environmental review process for the RREM program. ICF assisted DEP staff in developing a strategy to prepare the Tier 1 EA and set up the process for the Tier 2 reviews. ICF advised use of the Tiered process because of the large volume of single-family homes that would receive CDBG-DR funds and require environmental review.</li> <li>▪ ICF staff provided initial guidance (and prepared flow charts and guidance deliverables) on compliance with 24 CFR Part 58 and 24 CFR Part 55.</li> <li>▪ ICF developed an overall timeline for typical environmental reviews that included expected timelines for completion of the process for each level of environmental documentation (exempt, categorical exclusion, CENST, EA). This timeline was provided to DCA and DEP to help staff understand the length of time the environmental review can take.</li> <li>▪ ICF prepared and delivered guidance on compliance with the Floodplains eight-step decision-making process.</li> <li>▪ ICF provided guidance to and answered questions from DCA on how to interpret the HUD memo on the Adoption of FEMA and Other Federal Environmental Reviews.</li> <li>▪ ICF answered questions from DCA about compliance with Section 106 of the NHPA and development of the Programmatic Agreement. ICF provided advice to DCA on how to ensure the intent of the PA was adequately reflected in the Tier 1 EA for the RREM program.</li> <li>▪ ICF provided guidance to both DCA and DEP staff on the levels of environmental review that would be required for the programs in the action plan.</li> </ul>



California Weatherization Assistance Program		
<b>Professional Services:</b>		
HUD	NEPA	Section 106
		✓
<b>Client</b>		
California Department of General Services		
<b>Client Reference:</b>		
<p>██████████ Senior Environmental Planner California Dept. of General Services ██████████</p> <p>██████████ Research Analyst, Energy &amp; Environmental Services Division California Department of Community Services &amp; Development ██████████</p> <p>██████████ Historian, Review and Compliance Unit, California Office of Historic Preservation ██████████</p>		
<b>Period of Performance</b>		
12/2010 – present		
<b>Key Staff:</b> Richard Starzak, Colleen Davis		
<b>Project Relevance to this Program:</b>		
<p>The California Weatherization Assistance Program is relevant to the NJ program because ICF provided qualified architectural historians to assist the California SHPO under a Programmatic Agreement to conduct more than 10,000 Section 106 reviews. Working with SHPO early on, ICF creatively streamlined the original methodology described in the PA for different aspects of the program, crafted templates for multiple applicant groups for consistency, and developed a very efficient database and research and tracking tools to process the high volume rapidly, therefore ensuring timely release of Federal funding.</p>		
<b>Description of Work:</b>		
<p>ICF, as Section 106 consultant, is assisting the California Department of General Services and the CSD in the implementation of the First Amended PA among the California Energy Commission, CSD, and the California SHPO regarding Section 106 Compliance for DOE ARRA Programs. CSD administers Federal programs to assist low-income families across the entire State of California to increase the energy efficiency of their homes. CSD will receive \$185 million in ARRA funding for weatherization projects. In the first 18 months, ICF's architectural historians reviewed more than 10,000 residential units under the terms of the PA. ICF worked effectively with SHPO staff to streamline the Section 106 reviews so that approvals are received within 2 business days of ICF's receipt of an application to facilitate ARRA funding. ICF staff made such a great impression with the client and SHPO that they have been allowed to work on this effort with minimal oversight. As a result, from 2012 to 2015, ICF's role was expanded to conduct Section 106 reviews for projects funded by both the Department of Energy and the Department of Health and Human Services.</p>		
<p>Nationally, the Federal Government allocated \$5 billion in ARRA funding toward weatherization services for low-income households. The purpose of this funding is to not only reduce energy costs for these families, but also to create jobs for the industries that provide these services. These funds are allocated in every state across the United States with the State of California receiving approximately 3.7% of the funding. California contracted ICF to research each request for eligibility and comply with the Section 106 PA.</p> <p>Researching each request has involved reviewing application materials, searching several databases and reaching out to local communities. The result has been a large amount of information that needs to be compiled, analyzed, and stored. ICF developed tools to keep their notes, findings, and work products consolidated in an Access database where new findings can be added in real time and their progress can be tracked instantaneously. This database, when used with the project's SharePoint site, has built an index of communities and historic preservation information across California. Having such tools in place has allowed ICF to accommodate additional requests, remain incredibly efficient, and work with other staff across the company.</p>		



## NEPA and Section 106 Technical Assistance to MSHDA for the NSP2 Grant

Professional Services:			
CDBG	HUD	NEPA	Section 106
	✓	✓	✓
Client:			
HUD			
Client Reference:			
<p>██████████ Senior Policy Specialist MSHDA ██████████</p> <p>██████████ Office of Rental Development MSHDA ██████████</p> <p>██████████ Deputy State Historic Preservation Officer ██████████</p> <p><i>“The support from you and your team has been invaluable to our NSP2 program.”</i> — Michele Wildman, MSHDA</p>			
Period of Performance			
2010 – Present			
<p><b>Key Staff:</b> Neil Sullivan, Richard Starzak, Colleen Davis, David Coate, Christine Hartmann, Cathy Dymkoski, Kelly Price</p>			
<p><b>Project Relevance to this Program:</b></p> <p>Under a technical assistance (TA) contract with HUD, ICF supports the Michigan State Housing Development Authority (MSHDA) and its 12 consortium members in ensuring compliance with HUD’s environmental regulations at 24 CFR Part 58 and NHPA Section 106. The ICF Team brought in multiple environmental experts, within a span of 30 days, to assist on diverse environmental TA issues. We have completed documents quickly and accurately enabling MSHDA to meet HUD deadlines. <i>Our knowledge and experience will provide the proposed DEP contract team with techniques for efficient workflow to comply with all HUD environmental regulations in a timely manner.</i></p> <p><b>Description of Work:</b></p> <p>ICF provides capacity and program knowledge, alleviating client concerns over environmental compliance. Our work includes coaching staff to prepare environmental reviews, preparing Tier I and Tier II EAs, reviewing ERRs and providing guidance on their completion, delivering training, and working with the SHPO to resolve ongoing issues and stalled program implementation.</p> <p>We have prepared a Tier I supplemental EA for the addition of 72 new NSP2-eligible census tracts in Detroit, Wyandotte, and Highland Park. In addition, we have prepared multiple Tier II EAs for hundreds of property demolition and renovation projects in Detroit, Hamtramck, Highland Park, and Ingham County. For example, ICF prepared a single Tier II EA covering more than 1,000 properties proposed for demolition by the City of Detroit.</p> <p>ICF also reviewed and provided guidance on compliance with Part 58 requirements for multiple ERRs prepared for multifamily developments or demolition of multifamily units in multiple cities. ICF has delivered several rounds of ERR training and webinars to MSHDA and consortium staff. Training has covered compliance with HUD’s regulations at 24 CFR Part 58; compliance with NHPA Section 106; and ERR preparation techniques, including how to analyze and address noise, contaminated sites, and above ground storage tanks in the ERR.</p> <p>ICF facilitates consultation with the SHPO, assisting consortium members with identifying historic properties and assessing effects. In cases where demolition of historic properties is involved, ICF assists with resolving the resulting adverse effect by consulting with the SHPO to develop mitigation and memorandums of agreement (MOAs). We have facilitated Section 106 reviews with the SHPO for a number of consortium partners by:</p> <ul style="list-style-type: none"> <li>▪ Gaining SHPO concurrence that abandoned, historic age buildings did not meet NRHP criteria and could be demolished.</li> <li>▪ Drafting and facilitating an MOA to ensure that burials associated with the Chippewa and Odawa tribes were not disturbed by the demolition of historic-age abandoned buildings.</li> <li>▪ Preparing mitigation for proposed demolitions by developing a comprehensive mitigation plan, following the outline in HUD’s toolkit for Section 106 and the NSP2.</li> </ul>			





Broadband Initiatives Program (BIP)			
<b>Professional Services:</b>			
CDBG	HUD	NEPA	Section 106
		✓	✓
<b>Client:</b>			
United States Department of Agriculture, Rural Utilities Service			
<b>Client Reference:</b>			
[REDACTED] Archeologist, Federal Preservation Office [REDACTED] [REDACTED] Engineering and Environmental Staff, USDA Rural Utilities Service [REDACTED] [REDACTED]			
<b>Period of Performance</b>			
July 2009 – July 2013			
<b>Project Relevance to this Program:</b>			
ICF has provided onsite specialists to provide NEPA Section 106 and Endangered Species Act (ESA) review of applications and to assist in determining mitigation required by awardees for this nationwide program. ICF also led program management support and developed associated IT and GIS systems.			
<b>Description of Work:</b>			
ICF is assisting with the implementation of the Rural Utilities Service's ARRA-mandated BIP, an initiative to bring broadband infrastructure to rural communities across the country. In doing so, <i>ICF has reviewed more than 2,000 applications requesting nearly \$30 billion dollars.</i> Applications are reviewed by ICF analysts who assess both the financial and technical feasibility of the plans put forth in the applications. Applications are also reviewed by ICF's geospatial analysts, who overlay applicant drawn maps with multiple data sources to determine if applications meet program eligibility requirements (e.g. percentage of proposed service area is rural) and to verify scoring metrics (e.g., distance to nearest non-rural area).			
ICF has provided two onsite specialists to provide NEPA, Section 106 cultural, and ESA review of applications and to assist in determining any mitigation required by awardees. In addition, ICF will continue to provide support during implementation of the 320 BIP awards. ICF has developed a robust reporting capability to provide both regular and ad hoc reports and analyses. Reports often cover topics pertaining to target geographic areas, application statuses, and award projections. ICF's reporting and geospatial staff also work together to analyze incumbent comments provided through a public notice processes and determine their impact on applications.			
In addition to the environmental compliance, BIP is an example of a complex, integrated project that required a project management program; a robust IT and data tracking capability, and management of grants administration process to track applications through the review and award process. <i>ICF's ability to rapidly ramp-up operations was praised by the Undersecretary for Rural Development in a letter sent to the Government Accountability Office.</i>			



NEPA Support for Office of Justice Programs		
<b>Professional Services:</b>		
HUD	NEPA	Section 106
✓	✓	✓
<b>Client:</b>		
U.S. Department of Justice		
<b>Client Reference:</b>		
<p>██████████, NEPA Manager Bureau of Justice Assistance ██████████</p> <p>██████████ Deputy Director, Bureau of Justice Assistance ██████████</p> <p><i>“Work performed by ICF is accurate, complete, and of the highest quality.”</i> —Eileen Garry, Deputy Director, Bureau of Justice Assistance</p>		
<b>Period of Performance</b>		
2000 - September 2013		
<b>Key Staff:</b> Neil Sullivan, John Hansel		
<b>Project Relevance to this Program:</b>		
ICF provided NEPA document preparation, review, and guidance for Federal grant-funded projects.		
<b>Description of Work:</b>		
<p>ICF provided NEPA support to the Office of Justice (OJP), Bureau of Justice Assistance (BJA) in reviewing EAs, environmental impact statements (EISs), and other NEPA documentation on a wide variety of eligible construction and program activities designed to improve criminal justice systems proposed by state, local, and tribal governments across the United States that received Federal grants. We assisted the OJP and grantees with evaluating NEPA requirements; consulting with Federal agencies and SHPOs; and ensuring compliance with NEPA and associated laws, regulations, and executive orders. Some of the projects we reviewed received additional grant funds from HUD. In these cases, ICF reviewed HUD environmental documentation in addition to Department of Justice NEPA documents.</p> <ul style="list-style-type: none"> <li>▪ ICF prepared more than 10 EAs for prison expansion and construction projects in Illinois, Oregon, New Hampshire, Alabama, West Virginia, and California. These projects involve environmental issues similar to those of multifamily residential developments.</li> <li>▪ ICF reviewed approximately 250 EAs prepared by grantees for new prison construction or expansion projects.</li> <li>▪ ICF also assisted in the preparation and review of one EIS for a prison expansion project; one EIS for a new prison project; and two joint EIS/environmental impact report documents for California prison projects.</li> <li>▪ ICF conducted independent analyses to assist grantees in filling gaps in their NEPA documents; served as a liaison between the grantees and the U.S. Fish and Wildlife Service (USFWS) and SHPOs; supported grantees in addressing public comments received on their draft documents; recommended appropriate mitigation measures; and supported the preparation of findings of no significant impact for publication.</li> <li>▪ At project initiation, OJP determined that NEPA applied to its grant program. Of 575 grant-funded projects, approximately 150 were in some phase of construction when the contract began. For these projects that were under construction (or near the completion of the design phase), ICF assessed project compliance with applicable environmental impact statutes and regulations.</li> <li>▪ ICF prepared and delivered training on NEPA and related environmental regulations for more than 200 grantee staff members and to state and local agencies receiving Federal grants for new or expanded prisons and jails for violent offenders.</li> </ul>		



Department of Energy—NEPA Support for Office of Energy Efficiency and Renewable Energy		
<b>Professional Services:</b>		
HUD	NEPA	Section 106
	✓	✓
<b>Client</b>		
United States Department of Energy, Office of Energy Efficiency and Renewable Energy		
<b>Client Reference:</b>		
<p>██████████ NEPA Compliance Officer, Golden Field Office ██</p> <p>██████████ NEPA Compliance Officer, EERE (██████████) ██</p>		
<b>Period of Performance</b>		
July 2009 – January 2012		
<b>Key Staff:</b> Neil Sullivan, Christine Hartmann, Lizelle Espinosa		
<b>Project Relevance to this Program:</b>		
ICF helped manage the NEPA process and placed project staff onsite at DOE Headquarters and in the Golden Field Office to efficiently process thousands of grant applications and complete the NEPA process. <i>We assisted in quickly moving grants through the NEPA requirements, allowing grant funds to be spent.</i>		
<b>Description of Work:</b>		
<p>The DOE Office of Energy Efficiency and Renewable Energy (EERE) provides grants to various recipients of the Energy Efficiency and Conservation Block Grant (EECBG) program and state energy offices through the State Energy Program (SEP) as part of the ARRA of 2009.</p> <p>ICF provided NEPA support to DOE's EERE office in reviewing EECBG Program and SEP grant applications that are funded by ARRA. ICF assisted in making NEPA determinations for thousands of projects as part of DOE's \$3.6 billion in ARRA funding. <i>This high profile project operated under intense scrutiny from the Vice President's office and ICF was instrumental in helping DOE perform NEPA reviews quickly to allow grant funds to be disbursed.</i></p> <p>ICF also assisted in managing and preparing more than 70 EAs for projects that include solar photovoltaic systems, wind farms, single wind turbines, geothermal systems and ground source heat pumps, biomass systems, industrial energy efficiency retrofits, anaerobic digesters, biorefineries, and other renewable energy projects. These projects are located throughout the United States and its territories. ICF worked directly with DOE to provide overall management and support for compilation and completion of the EAs, which had extremely aggressive schedules due to ARRA funding and timing requirements.</p>		



State of Louisiana CDBG Disaster Recovery Program			
<b>Professional Services:</b>			
CDBG	HUD	NEPA	Section 106
✓	✓	✓	✓
<b>Client:</b>			
State of Louisiana			
<b>Client Reference:</b>			
[REDACTED]			
<b>Period of Performance</b>			
2005–2008			
<p><b>Project Relevance to this Program:</b></p> <p>ICF supported the largest disaster recovery program in U.S. history, the Federally funded Louisiana disaster recovery program. For this project, ICF staff worked under the direction of the State of Louisiana to provide project start up, advisory and implementation services. The work included preparation of business processes and procedures, development of an MIS, reporting, training, supervision of property inspectors, and deployment and oversight of a cadre of subcontractors, all within the context of the CDBG-DR and FEMA’s Hazard Mitigation Grant programs. Important for this project, the work included environmental reviews of several thousand rental properties and coordination with the SHPO.</p> <p><b>Description of Work:</b></p> <p>The Louisiana Disaster Recovery Program provided financial assistance to property owners whose real estate was damaged or destroyed by Hurricane Katrina. ICF, working with the State’s Office of Community Development, was responsible for program implementation. In 3 years, the homeowner portion of the program handled almost 200,000 grant requests and 124,000 cases needing eligibility determination and fund disbursement to rebuild damaged properties. In addition, over the same timeframe, ICF managed the application intake, review, eligibility determination, and construction oversight for small rental properties, each requiring environmental reviews.</p> <p>Our staff, under contract to the state's CDBG program, interacted with HUD’s CDBG-DR Program, EPA, FEMA, and SBA as well as the State’s program staff, SHPO, environmental offices, local governments, and legislators. The program had to address a highly diverse housing stock both from a physical and ownership perspective, including single-family houses, condos, large and small rental properties, and manufactured structures. <i>Despite the political challenges and working in a physical environment of devastated infrastructure where public records and information systems had been destroyed, the program handled an enormous volume of applicants within the required timeframes.</i> Both HUD and State Inspector General closely monitored the program, and there were no findings of program fraud.</p>			





Tehachapi Renewable Transmission Project (TRTP)		
<b>Professional Services:</b>		
<b>HUD</b>	<b>NEPA</b>	<b>Section 106</b>
	✓	
<b>Client:</b>		
Southern California Edison (SCE)		
<b>Client Reference:</b>		
<p>[REDACTED]</p> <p>[REDACTED]</p> <p>Manager, Power Generation and Special Projects</p> <p>[REDACTED]</p> <p>“I wanted to pass along a ‘well done’ to your team... I cannot express enough how much we appreciate your team bringing issues to our attention and ensuring we resolve them.” – Maija E. Benjamins, Senior Biologist, Southern California Edison</p>		
<b>Period of Performance</b>		
2008 – Present		
<p><b>Project Relevance to this Program:</b> This project demonstrates our ability to provide environmental documentation on a large project under a challenging schedule. The ICF team has more than 400 biologists conducting field surveys and helping construction crews avoid sensitive resources. We are developing more than 60 field reports daily for this multi-year program.</p> <p><b>Description of Work:</b> ICF’s client, a public utility, needed to construct 175 miles of transmission line, California’s first major transmission line built specifically to increase delivery of renewable energy. To get this done on an aggressive schedule, our client needed an effective process for delivering biological surveys and construction monitoring that could ensure the program was not delayed by environmental issues. We met this aggressive schedule by employing a large team of the best biologists in the western United States; accurately conveying data through high-quality reporting; and adapting to dynamic project schedules.</p> <p><b>Wetland Permitting:</b> Since 2008, ICF has worked closely with SCE to develop and execute the wetland permitting program for this complex linear transmission project. The project spans two U.S. Army Corps of Engineers districts and several California Regional Water Quality Control Board and California Department of Fish and Game districts. During the initial planning phase of this task, ICF prepared a comprehensive regulatory permitting strategy report detailing the anticipated permitting requirements, associated timelines, and strategy for obtaining necessary agency permits and approvals for the project.</p> <p><b>Biological Surveys:</b> ICF has been conducting focused surveys for a wide range of special-status species during 2010. Surveys are being conducted for 24 special-status species of birds, mammals, reptiles, amphibians, and a number of rare plants with potential to occur along the project alignment.</p>		



NSP2 On-Call Environmental Review TA		
<b>Professional Services:</b>		
HUD	NEPA	Section 106
✓	✓	✓
<b>Client</b>		
Office of Technical Assistance Management, Community Planning and Development Division, HUD		
<b>Client Reference:</b>		
<p>██████████            Technical Representative            ██████████            ██████████            Title: Team Leader, NSP            ██████████            ██████████</p>		
<b>Period of Performance</b>		
February 2010 – March 2012		
<b>Key Staff:</b> Cathy Dymkoski		
<b>Project Relevance to this Program:</b>		
The project described here demonstrates the range of the ICF staff's skills and experience in administering and providing TA related to HUD's environmental compliance requirements and policies.		
<b>Description of Work:</b>		
<p>The NSP was established for stabilizing communities that have suffered from foreclosures and abandonment. ICF is the lead TA provider helping HUD to manage and organize the activities of eight other NSP TA provider grantees. Activities include providing TA to NSP1, NSP2, and NSP3 grantees, developing and maintaining a Web site, producing written products, planning and executing Problem Solving Clinics, assisting the eight other TA providers with their activities, delivering webinars and organizing the delivery of services to grantees with HUD and the other TA providers. ICF also provides onsite and remote TA to NSP1, NSP2 and NSP3 grantees throughout the country.</p> <p>All nonprofit grantees that were not part of a consortium with a government partner had to request HUD to complete environmental reviews for each project and activity that used NSP2 funds. To assure nonprofits the environmental information they had gathered met HUD's needs for completing its environmental compliance reviews on individual projects, grantees were required to submit their documentation to ICF for comments and recommendations before submitting it to HUD.</p> <p>There were two components to this TA project: (1) development of an environmental review guide for nonprofit grantees, HUD Regional/Field Environmental Officers, and (2) hands on review of grantees' ERR by ICF staff.</p> <p><i>ICF developed the Environmental Review Guide for Private Nonprofit Recipients of NSP2 Grants—24 CFR 50, which was approved by HUD.</i> The guidebook provided detailed instructions to the grantees on the type of information they were to gather, the form in which it had to be presented to HUD, and the environmental clearance process to be followed from the time a project was identified to the time HUD authorized expenditure of project funds.</p>		



## FEMA Radiological Emergency Preparedness (REP) Exercise Evaluation and Program Management Support

### Professional Services:

HUD

NEPA

Section  
106

### Client:

Department of Homeland Security,  
Federal Emergency Management  
Agency

### Client Reference:

██████████  
COTR  
██████████  
  
██████████  
Technological Hazards Division  
██████████

### Period of Performance

July 2000 – September 2016 (current  
contract started August 2011)

### Project Relevance to this Program:

This contract is an example of ICF's ability to support programs with a national focus on a Federal, state, and local level. FEMA REP also involves a multitude of tasks referenced in this procurement, such as program management and monitoring; distribution of work among subcontractors based on availability, cost, and performance; operations and logistical support through planning and training coordination; and administration of personnel and costs through Web-based information tools. *This project demonstrates ICF's ability to mobilize quickly, manage a large pool of subcontractors, and develop and implement Web-based systems used by FEMA and the entire ICF project team to efficiently organize, execute, track, and report on contract and program performance.*

### Description of Work:

ICF supports FEMA in the evaluation of off-site REP exercises and drills at nuclear power plants. ICF is responsible for managing and administering activities performed under the REP program including: (1) enhancing Federal, state, and local governments' and the private sector's ability to plan, prepare for, and respond to all types of peacetime radiological emergencies and (2) ensuring that adequate offsite emergency plans and preparedness are in place and can be implemented by state and local governments to protect the health and safety of the public living in the vicinity of commercial nuclear power plants.

*ICF mobilized support for the REP Program within 30 days of contract award*, which required: hiring 130 highly skilled professionals; establishing more than 50 subcontract agreements; conducting kick-off and coordination meetings with FEMA, the incumbent contractor, and subcontractors; establishing project-specific accounting and reporting systems; developing Task Order budgets and management and QA plans; developing and implementing a project management Web site; and implementing project-specific cost collection and reporting tools. *ICF now maintains a pool of >200 evaluators and executes more than 60 task orders to provide support for 50 to 90 FEMA-graded exercises and drills conducted every year.* For each event, ICF deploys teams of up to 50 evaluators to evaluate state and local governments' actions in response to simulated releases from nuclear power plants. Since 2000, ICF has evaluated more than 680 nuclear power plant preparedness exercises and drills, including 43 in New Jersey.

ICF has developed and uses specific management protocols and procedures to conduct a contract of this size, complexity, and scope to:

- ensure that we distribute work equitably among team members
- achieve the specific goals related to subcontracted work established for the contract
- manage and mitigate against actual, apparent, and potential conflicts of interest
- ensure that program costs are budgeted and managed to meet established cost goals
- ensure that any issues related to contract performance in the aggregate are identified and mitigated



- ensure QC-related measures regarding information management, cost reporting, schedule controls, and accounting and financial reporting are observed

As an integral part of our procedures, ICF developed a Web-based information system, the FEMA REP Online Operations Center (OOC). Accessible via the Internet, the OOC provides:

- the ability to quickly and easily identify Evaluators who are both qualified and available to support any given task order and make on-line staffing assignments based on that information
- enhanced on-line task order budgeting capabilities, including the ability to solicit and enter evaluator cost estimates for the work on-line
- the maintenance of an on-line library of program-related and exercise-specific information and reference materials accessible to all contract Evaluators the ability to capture performance information on contract staff to ensure that adverse information is considered when future exercise assignments are made availability of budget information to FEMA Headquarters and Field Office staff and provides a means for ICF to capture and report on staff labor and other direct costs as they are incurred.

Combined, these features enable ICF to manage this large and complex program cost-effectively, while improving the quality of service provided to FEMA.





Connecticut CDBG-DR Program Application Intake Contractor				
<b>Professional Services:</b>				
CDBG	HUD	NEPA	Section 106	
✓	✓			
<b>Client:</b>				
The State of Connecticut, Department of Housing				
<b>Client Reference:</b>				
<p>██████████  Program Manager  CDBG - Sandy Disaster Recovery Program  ██████████</p> <p>Department of Housing  505 Hudson Street  Hartford, CT 06106  T ██████████  ██████████</p>				
<b>Period of Performance</b>				
October 2013 – September 2014				
<b>Key Staff:</b> Elizabeth Tick				
<b>Project Relevance to this Program:</b>				
ICF provided assistance to the state of Connecticut on its CDBG-DR program electronic application/intake process. <i>ICF's design and implementation of this user-friendly process is an example of the type of efficiencies we can offer DEP for environmental review procedures on the proposed contract.</i>				
<b>Description of Work:</b>				
To assist the State of Connecticut Department of Housing's (DOH's) implementation of its CDBG-DR Owner Occupied Rehabilitation and Rebuilding and Scattered Sites Rehabilitation and Rebuilding programs, ICF designed and implemented an accessible and user friendly online application. The goal of the project was to assist and secure complete applications from Connecticut property owners whose homes were damaged or destroyed by Superstorm Sandy. Once an application was determined to be complete by the ICF Quality Review team it was then submitted to DOH for final review and subsequent financial award determination. ICF reviewed more than 1,000 applications within three months and had an average acceptance rate of 95% of all applications submitted to DOH.				
To further assist applicants in completing their application, within 30 days of the start of the contract, ICF established an application call center, six intake centers, and mobile intake units staffed by individuals trained to assist applicants through the application process. Each application intake center was identified by ICF; staffed with intake counselors and a manager; and equipped with computers, printers, and scanners that applicants could use to complete their application. Mobile units, equipped with laptops and mobile scanners, were also available to those who could not travel to an intake center. The call center assisted applicants in scheduling an appointment at one of the intake centers or answered basic questions about the application process. Also within 30 days, ICF conducted extensive outreach to potential eligible applicants including; outbound calls and a mass mailing and email campaign.				



Environmental Review Preparation for Pennsylvania CDBG-DR Buyout Program		
<b>Professional Services:</b>		
HUD	NEPA	Section 106
✓	✓	
<b>Client:</b>		
Pennsylvania Department of Community and Economic Development (DCED)		
<b>Client Reference:</b>		
<p>██████████ Chief, Center for Community Financing                  Pennsylvania DCED</p> <p>██████████</p> <p>██████████</p> <p>Center for Community Financing                  Pennsylvania DCED</p> <p>██████████</p>		
<b>Period of Performance</b>		
2012		
<b>ICF Key Staff:</b> Neil Sullivan		
<b>Project Relevance to this Program:</b>		ICF developed a sample eight-step floodplain review for the properties.
<b>Description of Work:</b>		<p>ICF worked on the initial stages of ERR preparation for a proposed buyout activity using HUD CDBG-DR program funds for activities eligible as a result of the impacts of Hurricane Irene and Tropical Storm Lee in September 2011.</p> <p>For the Commonwealth to carry out the buyout and demolition activities for up to 400 properties in the floodplain, it must conduct and complete an environmental review of the project and proposed impact of the project on the environment in accordance with HUD requirements. However, the Pennsylvania DCED is in the process of finalizing the list of eligible properties, and the project is on hold.</p>



MacArthur Park Apartments NEPA EA		
<b>Professional Services:</b>		
HUD	NEPA	Section 106
✓	✓	✓
<b>Client:</b>		
McCormack Baron Salazar		
<b>Client Reference:</b>		
<div style="background-color: black; width: 100px; height: 15px; margin-bottom: 5px;"></div> McCormack Baron Salazar <div style="background-color: black; width: 100px; height: 15px; margin-bottom: 5px;"></div> <div style="background-color: black; width: 50px; height: 15px; margin-bottom: 5px;"></div> Los Angeles Housing Department <div style="background-color: black; width: 100px; height: 15px; margin-bottom: 5px;"></div>		
<b>Period of Performance</b>		
2011 – 2012		
<b>ICF Key Staff:</b> Richard Starzak		
<b>Project Relevance to this Program:</b>		
ICF prepared a NEPA EA for approval by the California Tax Credit Allocation Committee per the standards and guidelines of HUD to qualify the project for the receipt of Federal stimulus funds.		
<b>Description of Work:</b>		
<i>ICF ensured that the client received the environmental document expeditiously so that the construction for the project could begin in a timely manner.</i> The project proposed construction of 90 two- and three-bedroom affordable housing units in a number of three-story buildings. The multiple modes of public transit, availability of cultural and social service providers, proximity to major employment centers, and abundance of other public amenities at this particular location have positioned this development to be a model for future development projects in the City of Los Angeles.		



Skid Row Housing Trust Skid Row Housing Project		
<b>Professional Services:</b>		
HUD	NEPA	Section 106
✓	✓	✓
<b>Client:</b>		
Tax Credit Allocation Committee/HUD		
<b>Client Reference:</b>		
<p>██████████ Skid Row Housing Trust ██████████</p> <p>██████████ Los Angeles Housing Department ██████████</p>		
<b>Period of Performance</b>		
2009–2010		
<b>ICF Key Staff:</b> Richard Starzak, Colleen Davis		
<b>Project Relevance to this Program:</b>		
ICF completed an EA for a HUD-funded low-income housing development known as the New Genesis Apartments in downtown Los Angeles.		
<b>Description of Work:</b>		
The project involved constructing 106-unit low-income housing complex with first-floor commercial, outdoor recreational, and support services space. Design, construction, and operation of the proposed housing development would seek the U.S. Green Building Council (USGBC) LEED silver rating through adherence to various USGBC standards pertaining to materials containing volatile organic compounds, erosion control, storm water issues, light pollution, water efficiency, energy performance, green energy, and renewable building materials.		





## NEPA Categorical Exclusion and Section 106 Review for City of Los Angeles

Professional Services:			<b>Project Relevance to this Program:</b>
HUD	NEPA	Section 106	
✓	✓	✓	
<b>Client:</b>			<b>Description of Work:</b>
Los Angeles Housing Department/HUD			<p>The rehabilitation of the 36<sup>th</sup> Street Apartments was carried out by the Coalition for Responsible Community Development (CRCD), with assistance from the Los Angeles Housing Department (LAHD), through funding from HUD. The project involved the rehabilitation of several existing historic-age residential buildings on a single parcel to create housing in South Los Angeles for homeless youth and youth who have aged out of foster care. On behalf of CRCD and LAHD, ICF conducted a review of the project in compliance with NHPA Section 106 and NEPA.</p> <p>In addition, we determined the property eligible for listing in the NRHP and reviewed the project plans to ensure conformance with the Secretary of Interior's Standards for the Rehabilitation of Historic Buildings and the California Historical Building Code. The project team encountered many issues through the design and execution of the project.</p>
<b>Client Reference:</b>			
<p>██████████ Coalition for Responsible Community Development ██████████</p> <p>██████████ City of Los Angeles Community Development Department ██████████</p>			
<b>Period of Performance</b>			<p>ICF assisted the owner and project architect with overcoming these issues, conducting frequent site visits and responding to requests for information. The project was completed in 2011 and now provides permanent housing for at-risk youth. <i>The project was the recipient of a 2012 Preservation Design Award from the Los Angeles Conservancy.</i></p>
2011			
<p><b>ICF Key Staff:</b> Richard Starzak, Colleen Davis</p>			



2401 Jefferson Boulevard HUD EA		
<b>Professional Services:</b>		
HUD	NEPA	Section 106
✓	✓	✓
<b>Client:</b>		
City of Los Angeles		
<b>Client Reference:</b>		
<p>██████████ New Urban Partners, LLC ██████████</p> <p>██████████ Los Angeles Housing Department ██████████</p>		
<b>Period of Performance</b>		
2006 – 2009		
<b>Key Staff:</b> Richard Starzak, Colleen Davis		
<b>Project Relevance to this Program:</b>		
ICF prepared a NEPA EA for a 52-unit residential and 9,000-square-foot commercial mixed-use project in Los Angeles per HUD guidelines. We prepared NEPA documentation for multifamily housing per HUD guidelines. We also conducted Section 106 review and Secretary of Interior Standards for Rehabilitation of Historic Properties compliance.		
<b>Description of Work:</b>		
ICF managed preparation of the EA and met all noticing requirements per HUD guidelines to help the client apply for release of funds under HUD grants.		
This project involved the demolition of an historic-age building that occupied the proposed site. ICF prepared Section 106 documentation that determined that the building scoped for demolition was not eligible for listing in the NRHP. The project site abutted an NRHP-eligible historic district, and we prepared documentation reviewing the proposed development for compatibility with the historic district.		



HUD Section 106 Consultant for City of Los Angeles		
<b>Professional Services:</b>		
HUD	NEPA	Section 106
✓	✓	✓
<b>Client:</b>		
Los Angeles Department of Recreation and Parks		
<b>Client Reference:</b>		
<p>██████████ Community Development Department ██████████</p> <p>████████████████████ California Office of Historic Preservation ████████████████████</p>		
<b>Period of Performance</b>		
2006 – Present		
<b>Key Staff:</b> Richard Starzak, Colleen Davis		
<b>Project Relevance to this Program:</b>		
ICF has held an on-call contract with the City of Los Angeles since 2006 to serve as the City's historic preservation consultant for all HUD-funded Section 106 review undertakings completed under a programmatic agreement among the City, the California Office of Historic Preservation, and the Advisory Council on Historic Preservation.		
<b>Description of Work:</b>		
The work includes the completion of Section 106 review in compliance with the NHPA for all undertakings Federally funded through the Los Angeles Community Development and Housing Departments and additional undertakings funded through the Los Angeles Bureau of Engineering, the Los Angeles Department of Recreation and Parks, the Los Angeles Community Redevelopment Agency, and the Housing Authority of the City of Los Angeles, totaling more than 200 projects each year.		



Research to Support HUD's Noise and Storage Tank Regulations		
<b>Professional Services:</b>		
HUD	NEPA	Section 106
✓		
<b>Client:</b>		
HUD		
<b>Client Reference:</b>		
<p>██████████ Community Planner, Office of Environment and Energy ██████████</p> <p>██████████ Environmental Engineer, Office of Environment and Energy ██████████</p>		
<b>Period of Performance</b>		
November 2011 – September 2012		
<b>Key Staff:</b> David Coate, Christy Hartmann		
<b>Project Relevance to this Program:</b>		
ICF conducted a HUD environmental policy review.		
<b>Description of Work:</b>		
<p>ICF provided research services to HUD to support potential changes to existing regulations on noise standards and storage tank regulation. HUD's environmental noise standards were last updated in 1979. HUD recognized that new updates should take into account changes in assessments and mitigation technologies as well as the types of situations most commonly encountered in the field. ICF conducted a literature review to provide current information on noise and vibrations, existing building policies, standards for controlling noise, and mitigation and barrier policies. The resulting report pulled together this broad and diverse information into one accessible document as well as a short factsheet for NSP grantees.</p> <p>Similarly for the storage tank regulation, ICF reviewed the existing regulations and guidebooks and identified potential areas for reevaluation. Specific topics researched include the identification of storage tank features and fire suppression systems, acceptable separation distances from HUD-assisted projects for specific storage tanks, pipelines, and their contents (liquid or gas), identification and assessment of the components of fuel cell storage tanks and how they may be regulated, and the identification and assessment of the components of storage silos and their propensity for explosions. ICF provided HUD topic-specific reports and several fact sheets for grantees.</p>		





National and Local HOME Community Development Technical Assistance (CDTA) including Environmental Review Course Development		
<b>Professional Services:</b>		
HUD	NEPA	Section 106
✓	✓	
<b>Client:</b>		
HUD, Community Planning and Development, Office of Affordable Housing Preservation		
<b>Client Reference:</b>		
<p>██████████ Award Manager ██████████ ██████████</p> <p>██████████ Contracting Officer ██████████ ██████████</p>		
<b>Period of Performance</b>		
September 2009 – September 2010		
<b>Key Staff:</b> Kelly Price, Cathy Dymkoski		
<p><b>Project Relevance to this Program:</b> The course provides comprehensive instruction in the environmental review process, including an overview of the laws and requirements, levels of review and the steps involved in completing an environmental review.</p> <p><b>Description of Work:</b> Over the past 12 years, ICF has been allocated more than \$20 million through CDTA competitions to provide HOME Training and TA nationally and to more than 30 HUD field offices. ICF has supported the HUD national and local HOME program on numerous contracts since 1991. Under the local HOME CDTA grants, ICF coordinates training activities with HUD field offices throughout the country working with their staff to address the specific needs of the grantees in their regions.</p> <p><b>Curriculum and Training Development:</b> ICF has written more than 70 HOME program model guidebooks and training manuals and developed more than 30 HOME-related training courses, and 11 HOME program online modules. Among these trainings, <i>ICF developed a training course on HUD's environmental compliance requirements (24 CFR Part 58) for projects and activities assisted with HOME program funds. It is the most comprehensive training, to date, on Part 58 requirements related to the HOME program.</i> The course focuses on Part 58 rules, NEPA, and classifying activities.</p>		



KY CDBG Handbook, Training and TA			
<b>Professional Services:</b>			
CDBG	HUD	NEPA	Section 106
✓	✓	✓	✓
<b>Client:</b>			
Kentucky Department for Local Government			
<b>Client Reference:</b>			
<p>██████████ Director, Office of Federal Grants ██████████</p> <p>██████████ Office of Federal Grants ██████████</p>			
<b>Period of Performance</b>			
June 2002 – Present (multiple contracts)			
<b>Key Staff:</b> Kelly Price, Cathy Dymkoski			
<b>Project Relevance to this Program:</b>			
ICF provides on-call TA, writes and updates CDBG handbook, and develops and delivers training curricula on the CDBG program, including environmental review.			
<b>Description of Work:</b>			
ICF rewrote and enhanced the Commonwealth of Kentucky's CDBG Administrators Handbook and developed the state's first official CDBG Certified Administrator testing program, both of which include environmental review. We annually update the handbook and related program tools for the state, keeping the State and our team abreast of the latest CDBG practices and policies. Our team also develops curricula and delivers over multiple annual training sessions, including training for new administrators to become certified and training on specialized advanced topics for already certified individuals. Each class includes modules on environmental review compliance. We also provided training for grantees on program compliance.			
In addition, the ICF Team developed new CDBG monitoring systems that included a Microsoft Access database, checklists and a handbook for KY CDBG staff.			
As needed, ICF continues to provide on-call TA on a range of CDBG and related topics, including environmental review. Recently, we delivered two in-depth sessions on how to prepare a Part 58 environmental review for state CDBG grant administrators. <i>With this experience, we offer DEP the latest knowledge and best practices available for State compliance with CDBG regulations.</i>			



South Carolina CDBG Handbook, Training and TA			
<b>Professional Services:</b>			
CDBG	HUD	NEPA	Section 106
✓	✓	✓	✓
<b>Client:</b>			
South Carolina Department of Commerce			
<b>Client Reference:</b>			
[REDACTED]			
Director, Grant Programs			
[REDACTED]			
[REDACTED]			
Executive Director			
SC Rural Infrastructure Authority			
[REDACTED]			
<b>Period of Performance</b>			
April 2000–Present (multiple contracts)			
<b>Key Staff:</b> Kelly Price, Cathy Dymkoski			
<b>Project Relevance to this Program:</b>			
ICF updated the state CDBG grantee handbook that included environmental review guidance and provided in-depth training on how to complete environmental reviews. <i>With this experience, our team brings DEP the efficiencies of up to date strategies for completing environmental reviews in compliance with CDBG as well as a developed training program.</i>			
<b>Description of Work:</b>			
ICF updated and revised the state's CDBG Implementation Manual and Resource Manual. Each year for the past 13 years, we have designed and delivered annual training workshops for state recipients and administrators on the implementation of CDBG-funded projects and special topics. Our implementation training includes modules on environmental review updates, process, and compliance issues. In 2011, ICF developed and delivered a 2-day hands-on course on how to conduct environmental reviews including how to determine the appropriate level of review, how to do the review, and where to find resources and appropriate documentation (including Web resources). Annually, we provide training and updated tools to state grant administrators to prepare Part 58 environmental reviews.			



New York State CDBG-DR TA			
<b>Professional Services:</b>			
CDBG	HUD	NEPA	Section 106
✓	✓	✓	
<b>Client:</b>			
U.S. Department of Housing and Urban Development – Office of Technical Assistance Management			
TA Recipient: State of New York			
<b>Client Reference:</b>			
<b>HUD:</b> [REDACTED], Division Director 451 7th St., SW Washington DC 20410 [REDACTED] [REDACTED], Executive Office of the Governor [REDACTED]			
<b>Period of Performance</b>			
July 2013 – January 2014			
<b>Key Staff:</b> Kelly Price			
		<b>Project Relevance to this Program:</b>	
		ICF managed this TA program for the State of New York as a recipient of CDBG-DR for Hurricane Sandy. The TA team's tasks involved program design and implementation issues, including environmental review consideration.	
		<b>Description of Work:</b>	
		Under a large cooperative agreement with HUD known as OneCPD Technical Assistance, ICF led a team of three TA providers to assist the State of New York as it explored the feasibility of an energy resiliency retrofit program to be funded with its Hurricane Sandy CDBG-DR allocation. Interested parties included the governor's office, New York State Energy Research and Development Authority and New York Homes and Community Renewal, the CDBG-DR administering agency.	
		ICF provided guidance both verbally and in writing on the initial program design, CDBG eligibility, and compliance aspects of such a program as well as direction on the market assessment that was conducted by another provider. The state has decided not to proceed with the program as of the date of this proposal.	





Somerville MA HUD Environmental Review TA			
<b>Professional Services:</b>			
CDBG	HUD	NEPA	Section 106
✓	✓	✓	✓
<b>Client:</b>			
HUD Office of Technical Assistance Management			
TA Recipient: Somerville, MA			
<b>Client Reference:</b>			
<b>HUD:</b> [REDACTED]			
<b>Somerville:</b> [REDACTED], Director of Finance and Administration			
<b>Period of Performance</b>			
February 2013 – April 2014			
<b>Key Staff:</b> Kelly Price, Cathy Dymkoski			
<p><b>Project Relevance to this Program:</b></p> <p>ICF provided direct, one-on-one TA to the City of Somerville on HUD Part 58 environmental reviews for CDBG-funded projects including procedures, tools/forms, training, remote TA and document review services.</p> <p><b>Description of Work:</b></p> <p>Under a large cooperative agreement with HUD known as OneCPD Technical Assistance, ICF was asked to provide comprehensive TA on all aspects of the City's CPD-funded programs including CDBG and cross-cutting Federal requirements including environmental review.</p> <p>ICF has assisted with the City's Consolidated Planning and related citizen participation process, helped address issues with financial and grant management, begun to redesign City programs and provided tools and guidance on documentation and compliance. As part of this effort, ICF reviewed the City's environmental review documentation and found it insufficient. ICF provided procedures to the City, as well as hands-on training for staff and guided the City through several Part 58/NEPA environmental reviews for current year projects.</p> <p><i>ICF's knowledge and practical experience with this program will help DEP and EAF Contractors to avoid insufficiencies in environmental compliance documentation so that documents are completed accurately the first time.</i></p>			



Virginia HOME and Environmental Review Handbook, Training and TA			
<b>Professional Services:</b>			
CDBG	HUD	NEPA	Section 106
	✓	✓	✓
<b>Client:</b>			
Virginia Department of Housing and Community Development (DHCD)			
<b>Client Reference:</b>			
<p>██████████ Associate Director Housing Policy and Compliance ██████████</p> <p>██████████ Deputy Director ██████████</p>			
<b>Period of Performance</b>			
March 2012 – June 2013			
<b>Key Staff:</b> Kelly Price, Cathy Dymkoski			
<p><b>Project Relevance to this Program:</b> ICF provided TA, wrote and updated handbook, and developed and delivered training curricula on the HOME program, including environmental review.</p> <p><b>Description of Work:</b> ICF trained and delivered on more than 14 separate tasks as they relate to the HOME program. The first task completed under this project was the development of the State's HOME Environmental Review Policy handbook for their HOME funded projects. Our team also delivered Environmental Review training to the Virginia DHCD staff once the policy handbook was completed.</p>			



## Environmental Reviews for HUD-Assisted Projects Training, HUD Office of Native American Programs

<b>Professional Services:</b>			<b>Project Relevance to this Program:</b>
HUD	NEPA	Section 106	
✓	✓	✓	This project demonstrates ICF's knowledge of the complex environmental review requirements applicable to HUD grants.
<b>Client:</b>			
Office of Native American Programs, US Department of Housing and Urban Development			<b>Description of Work:</b> ICF developed and delivered a 3-day training session on environmental review compliance for Indian Housing Block Grant Program, Indian Community Development Block Grant Program, Section 184 Loan Guarantee, Title VI Loan Guarantee and Native Hawaiian Housing Block Grant Program grantees/participants nationwide, including Alaska and Hawaii. Technical topics include NEPA and relevant Federal laws and authorities, 24 CFR Parts 50 and 58, categorical exclusions, environmental assessments and environmental impact statements, and self-monitoring. In addition to requiring a thorough understanding of HUD's environmental regulations and policies it also requires general knowledge about the regulations governing these HUD programs. ICF also administered a certification exam to training participants requesting certification from the National American Indian Housing Council in environmental review. The course is generally offered five to seven times a year in each of the HUD Office of Native American Programs' jurisdictions.
<b>Client Reference:</b>			
<p>██████████ Vice President, FirstPic Consulting ██████████</p> <p>██████████ Award Manager ██████████</p>			
<b>Period of Performance</b>			
June 2006 – March 2013			
<b>Key Staff:</b> Cathy Dymkoski			



Evolent Health Office365 Implementation		
<b>Professional Services:</b>		
HUD	NEPA	Section 106
<b>Client:</b>		
Evolent Health		
<b>Client Reference:</b>		
<p>██████████  Vice President of IT  ██████████</p> <p>██████████  Project Director, HUD Programs  First Pic Inc. Consulting  ██████████</p>		
<b>Period of Performance</b>		
November 2011– January 2012		
		<p><b>Project Relevance to this Program:</b>  ICF implemented SharePoint in Evolent’s Office365 environment to be used as their intranet and extranet.</p> <p><b>Description of Work:</b>  Evolent Health began as a health care IT startup in partnership with UPMC to deliver repeatable solution healthcare offerings. These offerings required multiple IT projects spanning multiple organizations with distinct timelines. Evolent engaged ICF to provide IT Subject Matter Expert support to rapidly set up their IT collaboration infrastructure.</p> <p>ICF is the partner of record for Evolent’s Office 365 implementation where we led the procurement, connection, and configuration of their Office 365 infrastructure focusing on their SharePoint collaboration platform.</p> <p>The initial result of the ICF initiative was the successful platform to facilitate the collaboration with a rapidly growing head count as the organization grew to take on Evolent Health’s first client. The SharePoint site was developed to be usable and saleable to support the growth of Evolent Health’s products and services.</p>





E-Filing for the Federal Trade Commission		
<b>Professional Services:</b>		
HUD	NEPA	Section 106
<b>Client:</b>		
Federal Trade Commission		
<b>Client Reference:</b>		
<div style="background-color: black; width: 100px; height: 15px; margin-bottom: 5px;"></div> Contracting Officer's Technical Representative <div style="background-color: black; width: 100px; height: 15px; margin-top: 5px;"></div> <div style="background-color: black; width: 80px; height: 15px; margin-bottom: 5px;"></div> Records and Filing Office <div style="background-color: black; width: 80px; height: 15px; margin-top: 5px;"></div>		
<b>Period of Performance</b>		
September 2007– September 2015		
<p><b>Project Relevance to this Program:</b></p> <p>E-Filing is a Web-based application that allows the FTC to receive and manage submission of documents related to Part 3 Adjudicative Proceedings, including those from complaint counsel, respondent counsel, and other relevant parties. E-Filing is a .NET 2.0 and SQL Server 2005 Web application that uses Windows SharePoint Services 3.0 for document management.</p> <p><b>Description of Work:</b></p> <p>To help enforce U.S. antitrust and consumer protection laws, the FTC issues administrative complaints under 16 CFR Part 3 when it believes companies are committing unfair or deceptive acts in the marketplace. Each FTC complaint kicks off a proceeding under which numerous legal filings may be submitted from interested parties over months or possibly years. This process was almost entirely paper-based and, as a result, inefficient for FTC staff, burdensome to filers, and limited in terms of public access to submitted materials. As a result, the FTC needed a contractor to develop a Web-based "E-Filing System" in which: (1) relevant counsel could submit filings electronically through Web-based collection forms; and (2) FTC staff could receive, review, track, sort, and process filings for each proceeding through real-time access to an intuitive, Web-based back office tool.</p> <p>Leveraging our existing CommentWorks software framework, ICF worked closely with the FTC to move through the software development lifecycle—through requirements refinement and validation, system design, software development and testing, and user acceptance and training. The system includes: administrative functions including user account management and proceeding setup, ingress tools in which filings can be submitted via Web forms or entered into the system by FTC staff, document processing tools for automatically creating 508-compliant, text-layered PDFs of each filing, Web posting tools to generate exports of filings and related indices in a format suitable for posting to an electronic "reading room" on the FTC's Web site, and other document processing functions.</p>		



## 8. Additional Experience of Bidder

### a) Knowledge of NEPA requirements; 24 CFR Part 58; 24 CFR Part 55 and other Federal laws and authorities

ICF has more than three decades of experience assisting clients in implementing the requirements of NEPA and related laws and authorities, including extensive experience preparing ERR documentation in accordance with HUD regulations. ICF uses our experience to help clients streamline the NEPA process to meet aggressive and challenging schedules. ICF has prepared more than 5,000 NEPA and other environmental regulation documents for a range of projects and clients.

ICF environmental specialists include nationally recognized NEPA authors and experts who wrote the definitive book on NEPA (The NEPA Book: A Step-By-Step Guide on How to Comply With the National Environmental Policy Act). Our NEPA experience and qualifications provide credibility and a demonstrated ability to produce defensible NEPA processes and products. In addition, state and Federal clients often ask ICF to deliver training to staff because we have unmatched expertise.

ICF provides guidance, management, and oversight of the NEPA process across Federal agencies, including HUD-funded programs. Our team includes former HUD Environmental Officers. An example of recent relevant HUD experience is **ICF's support** to MSHDA for its NSP2 grant. Under the MSHDA task, ICF trained consortium member community staff on **compliance with HUD's environmental regulations at 24 CFR Part 58, 24 CFR Part 55, and other related Federal laws and authorities.** ICF also reviewed EAs prepared by developers and Land Banks for multifamily and mixed use projects and provided comments and revisions to the EAs. We established a Tiered review process for rehabilitation and demolition projects. ICF also conducted monitoring of consortium member ERRs to assess compliance with MSHDA policies and HUD requirements at 24 CFR Part 58. As part of this process, ICF made a series of recommendations for improvement covering policies, staffing, and training.

ICF has provided NEPA management, guidance, and document review support to the U.S. Department of Justice, Office of Justice Programs for grant funded projects since 2000. This work has included the review of more than 250 EAs and hundreds of categorical exclusion requests for Federally

funded projects nationwide (including tribal projects). This work has covered the full range of Federal laws, Executive Orders, and other requirements that apply to NEPA reviews.

Another example of overall NEPA management and review **support is our work with the U.S. Department of Energy's Loan Programs Office.** Under this task, ICF helped manage the preparation of EAs and EISs and we also reviewed work products prepared by other contractors for a variety of energy-related projects receiving loans or loan guarantees. The projects spanned a range of energy sectors including solar, wind, gasification, biomass, transmission, and advanced vehicle technologies. This work covered the full range of Federal laws, Executive Orders, and other requirements that apply to NEPA reviews.

**Below, we provide a brief description of ICF's experience** overseeing and preparing documentation for the regulations, Executive Orders, and other laws and authorities listed in Section 4.1.10 a) subsections 1 through 6 in the RFO.

#### 1. HISTORIC PRESERVATION (36 CFR PART 800) AND FLOODPLAIN MANAGEMENT (EXECUTIVE ORDER 11988 AND 24 CFR PART 55)

ICF has an in-house team of more than 75 historic preservation specialists. We have extensive experience in **implementing the Advisory Council's regulations at 36 CFR Part 800** (implementing Section 106 of the NHPA) for a variety of projects. For example, the MSHDA project is relevant because ICF developed an excellent working relationship with Michigan SHPO staff. Many grant-funded projects had been stalled simply because historic-era buildings were involved, and the fund recipients had **inadequate Section 106 experience.** **Once ICF's architectural historians were involved, the project reviews were facilitated and the relationship with SHPO was repaired and projects received swift approval.**

Another example is the California Weatherization Assistance Program where ICF worked with the California SHPO under a PA to conduct Section 106 reviews. Working with SHPO, ICF creatively streamlined the methodology for the different Section 106 steps (evaluation, effects analysis, resolution) and developed a very efficient database, research tools, consulting party information, and staff availability tools to process the high volume with a 1 to 2 day turnaround. In **18 months, ICF's architectural historians processed over 10,000 reviews.**

ICF also has experience with implementation of Executive Order 11988 on Floodplain Management. We have both



prepared and reviewed numerous EAs and EISs for projects located in a floodplain that required compliance with Executive Order 11988. For example, we prepared a Floodplains Analysis and Statement of Findings for a proposed vehicle manufacturing plant in Monroe, Louisiana for a Department of Energy Advanced Vehicle Manufacturing loan project. ICF also prepared a generic 8-step floodplain analysis as part of a contract with the Pennsylvania Department of Community and Economic Development for buyout activities associated with CDBG-DR funding for flooding from Hurricane Irene and Tropical Storm Lee.

ICF is also assisting the Federal Aviation Administration with the management of an EIS for a proposed SpaceX Launch Facility, near Brownsville, Texas. The proposed site is located in both A Zone and V Zone floodplains. ICF is providing guidance on how to complete the floodplain analysis and comply with Executive Order 11988.

## **2. WETLAND PROTECTION (EXECUTIVE ORDER 11990)**

ICF has experience helping agencies comply with Executive Order 11990. For example, several of the freight rail EISs that we have prepared in the last few years for the Surface Transportation Board have included proposals to fill wetlands and necessitated project proponents to obtain a Section 404 permit from the U.S. Army Corps of Engineers. One of the projects—the Port MacKenzie Rail Extension in Alaska—involved the potential fill of between 137 and 318 acres of wetlands depending on alternative alignment. ICF led preparation of the EIS, which required wetland delineation, functional analysis, and ensured compliance with Executive Order 11990.

In addition, we have overseen and provided review of other contractors' **work concerning wetlands fill for the** Department of Energy and Department of Justice in the general NEPA support contracts described above.

## **3. COASTAL ZONE MANAGEMENT ACT (16 U.S.C. 1451, §§307(C), (D)), SOLE SOURCE AQUIFERS (40 CFR PART 149)**

ICF has experience managing Coastal Zone Consistency analysis and analysis of impacts to Sole Source Aquifers. We have done this as part of the NEPA support contracts with U.S. Department of Justice and DOE. We have prepared Tier 1 and Tier 2 EAs in Michigan that included analysis of these two subjects for properties in Detroit and Wyandotte within the Coastal Zone boundaries of Lake St. Clair, Lake Erie and the Detroit River. In another example, we prepared an analysis of

consistency with the Texas Coastal Management Program for a 13-mile rail line project near Houston. We are currently overseeing the Consistency Review in compliance with the Coastal Zone Management Act for the proposed SpaceX Launch Facility adjacent to Boca Chica Beach, near Brownsville, Texas.

## **4. ENDANGERED SPECIES ACT (50 CFR PART 402), WILD AND SCENIC RIVERS ACT (16 U.S.C. 1271, §§7(B), (C)), CLEAN AIR ACT (40 CFR PARTS 6, 51, 93), FARMLAND PROTECTION POLICY ACT (7 CFR PART 658), ENVIRONMENTAL JUSTICE (EXECUTIVE ORDER 12898), NOISE ABATEMENT AND CONTROL (24 CFR PART 51, SUBPART B), EXPLOSIVE AND FLAMMABLE OPERATIONS (24 CFR PART 51, SUBPART C), TOXIC CHEMICALS AND RADIOACTIVE MATERIALS (24CFR PART 58, §5(I)2), AND AIRPORT CLEAR ZONES AND ACCIDENT POTENTIAL ZONES (24 CFR PART 51, SUBPART D)**

ICF has experience in both preparing analysis and reviewing the work of other contractors for all these subjects under our HUD Technical Assistance contract in Michigan. The work with MSHDA has included rehabilitation, new construction, and demolition projects across Michigan cities that have included all of the above laws and authorities in the context **of compliance with HUD's regulations.**

In a recent task for HUD Headquarters, ICF reviewed existing HUD Regulation 24 CFR Part 51 Subpart C and the HUD guidebook "**Siting of HUD-Assisted Projects Near Hazardous Facilities**" and we **identified** potential areas for reevaluation and improvement. In addition, ICF supported HUD **Headquarters in a review of HUD's noise regulations and** guidance. ICF researched transit noise and vibration; building policies; potential mitigation measures and noise barriers; and frequency and impulse sound. Findings and recommendations from this review will be used in the development of an updated noise regulation and will aid with noise compliance and mitigation measures available in the NSP.

ICF also routinely covers the majority of these laws and authorities in our NEPA projects for other Federal agencies (with the exception of the HUD-specific requirements on explosive and flammable operations, toxic chemicals, and airport clear zones). We have experience with all these laws and authorities when preparing EAs and EISs for construction and regulatory projects such as:



- EIS for the 600-mile Rockies Express East gas pipeline through Missouri, Illinois, Indiana, and Ohio (Federal Energy Regulatory Commission)
- EA for proposed New England Transrail rail terminal in Wilmington, Massachusetts (Surface Transportation Board)
- EA for proposed Youth Development Center in Manchester, New Hampshire (Department of Justice)
- EA for a Juvenile Halfway-Back Facility in Chicago, Illinois (Department of Justice)
- EA for Frey Farm Landfill Wind Energy Project in Pennsylvania (Department of Energy)
- EIS for San Pedro Waterfront Development Project in California (U.S. Army Corps of Engineers/Port of Los Angeles)
- Programmatic EIS for Experimental Permits for Launch and Reentry of Reusable Suborbital Rockets—sites in Alaska, California, Florida, Virginia, Oklahoma, and New Mexico (Federal Aviation Administration)

## 5. FEMA STATUTORY REQUIREMENTS AT 44 CFR PART 10

ICF has experience preparing and reviewing documents in accordance with FEMA's environmental regulations for disaster-related actions in several states. Examples include:

- Categorical exclusion for bridge replacement project, Savannah, Missouri
- Categorical exclusion for debris removal, Berkeley, Missouri
- EA for Merrill Stevens Docks and Boatyard, Miami, Florida
- EA for Public Works Storage Facility, Sisseton, South Dakota
- EA for James Valley Christian School, Huron, South Dakota
- EA for Relocation of John Redd Road, Calhoun County, Florida
- EA for New Police Building, Carolina Beach, North Carolina

In addition, ICF prepared the initial draft of the Programmatic EIS for reforming the National Flood Insurance Program for FEMA. ICF is currently managing the public involvement process for this Programmatic EIS.

## 6. APPLICABLE NEW JERSEY LAWS

The ICF Team has technical knowledge, comprehensive resources, strategic work approach, and intimate familiarity with DEP Waterfront Development, Freshwater Wetland, Flood Hazard Area, and Coastal Area Facility Review Act regulations, as well as the U.S. Army Corps of Engineers (USACE) Section 9, 10, and 404 permitting, which helps us resolve problematic environmental issues quickly to satisfy project goals. Our subcontractor, AKRF, has a demonstrated record or success in waterfront development and redevelopment projects of all kinds, including: environmental permitting for cruise ship terminals; preparation of the Draft and final EIS and environmental permitting support for the Portal Bridge Capacity Enhancement Project on the Hackensack River; management of the environmental **permitting effort for a Back End Technology Project at PSEG's Mercer Generating Station on the Delaware River in Trenton;** oversight of the preparation of all environmental studies and technical documents to support a coastal zone consistency determination for the relicensing of the Salem and Hope Creek Generating Stations on the tidal Delaware Estuary in Salem, New Jersey; the continued permitting, regulatory **oversight, and field support for PSEG's Estuary Enhancement Program—the largest privately funded estuarine restoration program in the nation;** and the design, permitting, and construction oversight of wetland mitigation projects on behalf of the New Jersey Turnpike Authority. Our success with these projects is as much the direct result of our technical depth and attention to detail as it is to our reputation for intellectual honesty and integrity with both DEP and the U.S. Army Corps of Engineers.

### **b) Experience in working with Federal, state or local governments in the area of environmental reviews for HUD projects and FEMA compliance reviews 44 CFR Part 10, (bidders should provide a list of completed 24 CFR Part 58 environmental and 36 CFR Part 800 cultural resource reviews with Quote)**

Under a TA contract with HUD, ICF prepared 24 CFR Part 58 and 36 CFR Part 800 documentation for the NSP2 grant for the MSHDA and many of its 12 consortium member land banks and cities. ICF has also prepared 24 CFR Part 58 and 36 CFR Part 800 documentation for the City of Los Angeles, California. A list of the documentation prepared in accordance with 24 CFR Part 58 is provided in Section 8.4 of





this proposal. A list of 36 CFR Part 800 documentation prepared for Michigan HUD NSP2 projects is provided below:

- For 2608 Norwalk, City of Hamtramck, we resolved a situation where an inadvertent adverse effect was made by a contractor, **and had foreclosed on SHPO's and ACHP's** opportunity to comment. ICF resolved it by working with SHPO to re-design the building and lessen the effect.
- For Stone Street Burials, Flint, we prepared an MOA to avoid disturbing Chippewa and Odawa tribal burials so four residential buildings within the ancient cemetery could be demolished.
- For the clearance of 1,608 demolitions, City of Detroit, we met with SHPO and MSHDA, and assisted in gaining SHPO clearance for the City to demolish 1,608 buildings outside of potential historic districts.
- For Saginaw Central City Historic District, City of Saginaw, we prepared an MOA for the demolition of seven buildings within the historic district, and we redefined the historic district boundary and contributing buildings that comprise the district.
- For 2834 3rd Street, City of Wyandotte, demolition of a house, SHPO concurred with our finding of no adverse effect on the surrounding historic district.
- For 10 West Lofts, City of Pontiac, we advised a developer on how to redesign their rehabilitation plans, and SHPO concurred with a finding of no adverse effect.
- For 15 Waverly, City of Highland Park, demolition of abandoned apartments, SHPO concurred with our finding of no historic properties affected.
- For 9500 Sanilac, City of Detroit, demolition of a house, SHPO concurred with our finding of no historic properties affected.
- For 11 Duplexes in the City of Highland Park, demolition of abandoned duplexes, SHPO concurred with our finding of no historic properties affected.
- For 16 Duplexes in Highland Park, demolition of abandoned duplexes, SHPO concurred with our finding of no historic properties affected.

ICF is currently the City of Los Angeles's Historic Preservation Consultant for all HUD-funded projects conducted under a PA. We have held this role since 2006, during which time we have completed more than 1,000 individual project reviews. The work has required us to perform all aspects of the Section 106 review process, including: program management,

determinations of eligibility for the NRHP, project compliance **with the Secretary of the Interior's Standards for Rehabilitation**, impacts analysis and the resolution of adverse effects, mitigation, interested party consultation, and drafting standardized agreement documents. Under this contract, we have:

- Completed Section 106 Reviews under the PA for more than 1,000 projects since 2006.
- Conducted more than 95 expedited requests for Section 106 Review under the PA since 2006, most within 1 to 2 days of receipt.
- Completed a special review of 16 Energy Efficiency and Conservation Block Grant program projects within 1 week of receipt.

Below are some examples of the Section 106 reviews that we have prepared under the Los Angeles contract.

Section 106 Review for The Lincoln Heights Jail Capital Improvement Project—Los Angeles Housing Department. ICF completed a preliminary review of the proposed rehabilitation of the former Lincoln Heights Police Station and City Jail in the Lincoln Heights Community of Los Angeles, in compliance with Section 106 of the NHPA. As the **City of Los Angeles' historic consultant for all HUD-funded projects, we conducted this review per the terms of the City's** PA for HUD Section 106 reviews. Our effort involved **researching the property's development history and** assessing its physical integrity to evaluate whether it was eligible for listing in the NRHP, and preparing a formal NRHP determination of eligibility for the property. The determination was submitted to the California SHPO, who concurred with our recommended finding. The rehabilitation project is ongoing and ICF continues to work with LAHD to complete the project.

Manchester Jr. Arts Center/Vision Theatre Project—Los Angeles Community Development Department And Bureau Of Engineering. ICF conducted Section 106 Review for the rehabilitation and restoration of the 1931 Art Deco theatre in Leimert Park as a performing arts center for area youth. ICF prepared a determination of eligibility for the theatre and worked with the project architect to establish a **Secretary of the Interior's Standards compliant scope of work.** ICF conducted reviews of the project's construction drawings and specifications at their preliminary/concept, partial, and final design stages; advised on design changes; and attended regularly scheduled onsite construction meetings to discuss **the project's weekly status and resolve problems.** ICF also guided the completion of historic paint analysis and terrazzo



restoration, including the selection of materials and colors; **initiated an effort to document the theater's decoratively** painted auditorium ceiling with lidar scanning; and worked closely with the project architect and city engineers to provide informed responses to Requests for Information throughout construction. Our effort led to a successful, **Standards-compliant restoration of the theater's façade** (including the marquee and sign tower), exterior and interior lobbies, and second-floor spaces, and it has set the stage for **implementation of the project's second phase in 2013.**

**36th Street Apartments Project—Coalition for Responsible Community Development and the Los Angeles Community Development Department.** On behalf of CRCDD and the City of Los Angeles, ICF conducted Section 106 review for the conversion of a single-family residence to a low-income multi-family property. The project involved assisting the owner and project architect to overcome difficult issues, conducting frequent site visits, and responding to requests for information. The project received a 2012 Preservation Award from the Los Angeles Conservancy.

**Casa Alicia (Arapahoe Homes) Restoration Project—Pico Union Housing Corporation.** ICF performed Section 106 **review under the City's PA** for the rehabilitation of two relocated residences, on behalf of the nonprofit Pico Union Housing Corporation. The project involved rehabilitation of the residences to house youth and worker training programs for community residents, and required NRHP eligibility determinations for each residence, a thorough review of the project plans, frequent consultation with the project architect, and construction monitoring.

**Lankershim Depot Restoration and Reconstruction—Los Angeles County Metropolitan Transportation Authority and The Los Angeles Community Development Department.** ICF conducted Section 106 review for the restoration of the NRHP-eligible Lankershim Depot in North Hollywood, California. The effort included the review of **project designs to determine Secretary of the Interior's** Standards compliance, an effects analysis, and construction monitoring.

### **c) Years of Experience as Project Managers and the Projects for which these Project Manager Responsibilities were Implemented**

The following are a few selected examples of our experience in management and oversight of program level environmental compliance:

- MSHDA—NSP2 Environmental Compliance Support
- DOE—NEPA Support for ARRA Grants
- U.S. Department of Justice—NEPA Support for Grant-Funded projects Nationwide (over 12 years)
- Federal Aviation Administration—NEPA Support for the Office of Commercial Space Transportation (over 20 years)
- Missile Defense Agency—Environmental Program Management and NEPA Support (over 10 years)

For all of the major support contracts listed above, ICF has helped manage the agency environmental program. In each case, we also prepared many NEPA documents to enable the agencies to remain in compliance. Through the projects listed above (and others), our staff have gained extensive experience in managing programs and preparing NEPA documents across the Federal Government. We have learned from these prior engagements and are ready to apply our knowledge to the CDBG-DR program in New Jersey.

### **d) Experience with HUD in Preparing and Complying with HUD/NEPA Environmental Review Records for Governmental Agencies**

Collectively, the ICF staff has decades of experience with HUD environmental reviews. Our staff experience includes designing HUD environmental programs; providing research and recommendations on HUD environmental policies to HUD Headquarters; monitoring ERRs; training HUD staff, grantees, developers, and contractors; preparing ERRs; and managing HUD environmental staff. In short, ICF has extensive experience across the lifecycle of HUD ERRs that will be extremely valuable to New Jersey. The section below lists some of the documents ICF has prepared for HUD projects. In addition to the other HUD projects mentioned throughout this section, ICF was recently engaged to provide TA to the City of Somerville, Massachusetts in part to address **deficiencies in compliance with HUD's environmental** regulations. ICF is reviewing ERRs for Somerville and is conducting hands-on training for City staff—**experience and tools that can be directly applied to the NJDEP's proposed** contract for proven efficiencies.

### **e) Experience in Completing at Least Twenty (20) HUD Environmental Review Records in the Past Five Years**

The following list illustrates 20 ERRs that ICF has completed within the last five years.



1. CE for Professional Housing Development Apartments, Los Angeles, California (2010)
2. EA for Young Burlington Apartments, Los Angeles, California (2010)
3. EA for New Genesis Apartments, Los Angeles, California (2010)
4. Tier 1 EA for NSP2 Expanded Census Tracts in Highland Park, Wyandotte, and Detroit, Michigan (2012)
5. Tier 2 EA for Demolition of Two Former Gas Stations in Flint, Michigan (2013)
6. Tier 2 EA for Demolition of Five Properties in Highland Park, Michigan (2013)
7. Tier 2 EA for Demolition of Four Properties in Highland Park, Michigan (2013)
8. Tier 2 EA for Emergency Demolition of Three Multifamily Properties in Highland Park, Michigan (2012)
9. Tier 2 EA for Rehabilitation of Five Properties in Ingham County, Michigan (2012)
10. Tier 2 EA for Construction of Three Single Family Homes in Hamtramck, Michigan (2012)
11. Tier 2 EA for Demolition of Twenty Single Family Homes and Eleven Duplexes in Highland Park, Michigan (2012)
12. Tier 2 EA for Emergency Demolition of One Multifamily Property in Highland Park, Michigan (2012)
13. Tier 2 EA for Construction of 13 Single Family Homes and Demolition of 24 Single Family Homes in Hamtramck, Michigan (2012)
14. Tier 2 EA for Demolition of 1,300 properties in Detroit, Michigan (2012)
15. EA for Smith Village Development, Flint, Michigan (2012)
16. EA for Harbortown Residential Development, Benton Harbor, Michigan (2012)
17. EA for Gardenview Multifamily Development, Detroit, Michigan (2012)
18. EA for Empire Fire Station, Benton Harbor, Michigan (2011)
19. EA for 10 West Lofts Mixed Use Residential Development, Pontiac, Michigan (2011)
20. EA for Lafayette Lofts Mixed Use Residential Development, Pontiac, Michigan (2011)

## f) Experience with HUD Disaster Recovery Programs

ICF has extensive experience with HUD Disaster Recovery Programs. As mentioned earlier in this section, ICF is providing support to New Jersey DCA on implementation of its CDBG-DR grant from HUD. ICF has also provided support to the State of New York for its CDBG-DR Hurricane Sandy recovery efforts. ICF provided guidance on the recovery program design and implementation issues, including environmental reviews.

ICF has supported the State of Connecticut on its CDBG-DR program electronic application and intake process for Hurricane Sandy recovery, reviewing more than 1,000 applications within 3 months with an average acceptance rate of 95% of all applications submitted to DOH.

ICF also supported the largest disaster recovery program in U.S. history in the State of Louisiana following Hurricane Katrina. The work in Louisiana was performed under CDBG-DR and FEMA Hazard Mitigation Grant programs. In Louisiana, ICF provided project start-up, business processes and procedures, IT system development, reporting, environmental review oversight, training, and program management.

These **examples demonstrate ICF's experience in CDBG-DR** from several aspects that cover the lifecycle of the CDBG-DR process. We have expertise in program design, needs assessment, action plan preparation, application intake, implementation, environmental reviews, and audit preparation.

## g) Experience Using Web-Based Tools to Conduct and Document HUD 24 CFR Part 58 and 24 CFR Part 55 and FEMA 44 CFR Part 10 Reviews

ICF regularly employs Web-based tools to conduct and document NEPA reviews. For example, we used a variety of Web-based mapping tools and databases in our work with MSHDA in order to analyze the potential impacts of new construction, rehabilitation, and demolition of single- and multifamily units. An example of a Tier 2 EA we prepared for Highland Park, Michigan is included as an attachment to this proposal. The Tier 2 illustrates our use of the following Web-based tools:

- FEMA floodplain maps—Web-based and plotted on Google Earth



- **The Environmental Protection Agency's** Comprehensive Environmental Response Compensation and Liability Information System **database, Michigan's Leaking Underground Storage Tank database, and Michigan's Part 201** (releases of hazardous substances) database plotted on Google Earth maps to show proximity to the HUD-funded project
- Above-ground storage tanks plotted on Google Earth images to illustrate the distance from the HUD-funded property
- Former lead smelter contamination distribution plotted on aerial photos to show relation to HUD funded properties

For other Michigan projects, we have used **HUD's on-line** noise calculator and acceptable separation distance calculator. We have used state Department of Transportation databases to obtain average daily road traffic information **and the Federal Railroad Administration's Web-Based Accident Prediction System** database to obtain rail traffic numbers, speeds, and crossing protection information. This **information is needed for HUD's noise calculations.** As explained earlier, ICF has also conducted research for HUD Headquarters aimed at updating and improving these noise and hazardous operations tools.

### **h) Integrating Web-Based Data Entry with GIS Mapping and Field Data Collection and Potential Updating Online and Field-Based Data Entry Tools, Databases, and Forms**

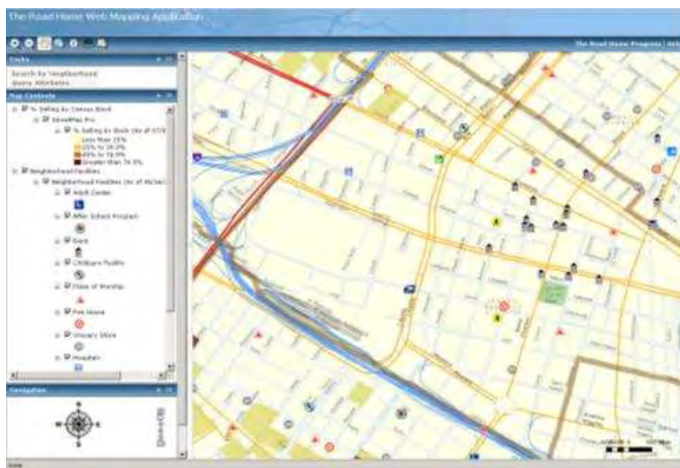
ICF develops GIS mapping, field data collection, and data entry tools for some of our nation's most complex problems. ICF's work includes projects specific to support disaster recovery programs. Examples include:

- **What's in My Backyard**—In particularly hard-hit areas, storm victims need information about the status of critical infrastructure and services (e.g., grocery stores, fire stations, banks, schools) in order to decide when it is feasible to return and rebuild. ICF used its in-house GIS capability to provide the public with information on infrastructure status at the ZIP code, parish (county), and neighborhood levels. ICF also included an online form for the public to report real-time infrastructure status updates.
- **Elevation Awards**—The program allowed for special grants up to \$30,000 for an applicant to elevate their home above the 100-year flood plain before rebuilding. The state wanted a procedure for determining the amount to award to each applicant that was simple, did not result in

overpayment (paying more than the actual elevation cost), and would avoid time-consuming disputes. The challenge was that determining the exact cost for elevating a property was an expensive and time-consuming process that involved engineering surveys and other documentation. To solve this problem, ICF used a quantitative analysis of elevation costs to develop a defensible lump-sum grant for each applicant based on type of construction (new construction, existing home, mobile home) that would avoid overpayment for 99.9% of all applicants. Based on this analysis, the state implemented the procedure.

- **Mississippi Data Project**—In Mississippi, several years into the Katrina recovery effort, ICF was hired by the Compass Group to assist the Mississippi Development Authority to collect, integrate and analyze Gulf Coast housing data related to Hurricane Katrina in order to assess, inform, and design programs in support of the housing recovery effort. The ICF Team of experts supported efforts to collect, integrate, and analyze data (e.g., FEMA inspections, housing, rental, **population**) **pertinent to Mississippi's** recovery from Hurricane Katrina. The housing data project was undertaken to detail the recovery that had occurred to date after Hurricanes Katrina, Rita, and Wilma, and to assess the remaining areas of unmet need.

#### **EXHIBIT 8-1. ICF USES GIS ON A WIDE VARIETY OF PROJECTS.**





### **i) Capability of Managing Paperless Environmental Workflows including Online Preparation and Review of Documents and Maps, and Management of Sub-Contractors via Extranet Workflow Software**

ICF uses a variety of commercial off-the-shelf or open source systems for content and workflow management. Examples of the projects and systems we have built include:

- Smart Energy Savers, Baltimore Gas and Electric,
- Do Your Part for Climate Friendly Parks, National Park Service/National Parks Conservancy,
- Consumers Energy Residential Trade Ally Program, Consumers Energy,
- California Advanced Lighting Control Training Program,
- Southern Maryland Energy Cooperative Home Energy Audit Scheduler, Southern Maryland Energy Cooperative,
- Residential Solutions Program, Public Service Company of Oklahoma,
- AEP Texas ENERGY STAR Homes, AEP Texas,
- PSO ENERGY STAR Homes, AEP Public Service Company of Oklahoma,
- Better Building Challenge, U.S. Department of Energy,
- NYC Clean Heat, Environmental Defense Fund,
- Pepco MD Residential Energy Efficiency Portal, Potomac Edison Power Company,
- Delmarva Power Home Energy Efficiency Portal, Delmarva Power,
- California Green Energy Innovations

### **j) Proof of Previous Experience**

We have provided sample of reports prepared by ICF to demonstrate our expertise in preparing the above documentation for similar projects (see *Appendix A. Sample Reports*). We provide these reports as an attachment submitted with this proposal. We have not prepared an eight-step floodplain analysis for a HUD project since all of our clients have avoided locating projects in a floodplain. To meet the requirement in the RFQ, we have included an eight-step floodplain analysis for a recent U.S. Army Corps of Engineers project. The examples we include are:

- Rehabilitation Project—Categorical Exclusion for Professional Housing Development Apartments, Los Angeles, California
- New Construction—EA for New Genesis Apartments Project, Los Angeles, California
- Tier 2 EA and Cultural Resources Report—Highland Park Tier 2 Environmental Assessment for 33 Property Demolitions (also includes the Section 106 report for 11 multifamily units analyzed in the Tier 2)
- Cultural Resources Review Record—Oxford Street Apartments, Los Angeles, California
- EA for Young Burlington Apartments Project
- Eight-Step Floodplain Analysis—Extract from Final EIS for Feather River West Levee Project, U.S. Army Corps of Engineers Sacramento District

### **k) Expertise and Resources to Manage the Issuance of Task Orders and Reporting in an Electronic Database including Individuals who have the Necessary Federal and State and Local Licenses, Certification and Training to Conduct Any and All Services Required to Perform the Scope of Services within this RFQ**

ICF has experience in managing the work of multiple contractors and reviewing work products prepared by those contractors. For example, we managed multiple subcontractors and other vendors for the State of Louisiana Road Home Program. We performed similar services for the DOE volume of grant funded projects and coordinated the work of multiple contractors, State Agency staff, and grantees. We managed this effort through a database and for the NEPA support aspect of the project, and we acted as an extension of the DOE staff.

For the Historic Preservation component of environmental reviews, ICF has 75 cultural resources staff who meet the **Secretary of the Interior's Professional Qualifications** Standards in history, architectural history, archaeology, or historic architecture. The ICF Team also has staff certified in environmental auditing, Environmental Site Assessment preparation and review, professional engineers, and certified Project Management Professionals. Our managers routinely oversee experts in a variety of fields across the environmental profession.



## 9. Subcontracts

As prime contractor, ICF is responsible for all deliverables specified in this RFQ and in our proposal. We are also committed, to the extent feasible and practical given the requirements of this evolving initiative, to meeting or exceeding the small-business subcontracting goal of 25% of contract value for small businesses registered in New Jersey.

We plan to meet contract requirements with an integrated team of New Jersey subcontractors. Our partners bring specialized experience supporting a wide range of environmental compliance in areas such as aquifers, wetlands, airports and other transportation systems, flood plains, farmlands, lead and other hazardous material. We also are partnering with New Jersey-based small businesses that specialize in archeology and cultural history. Our subcontracting approach includes using a local, small business temporary staffing firm that will retain a portion of

the staff on their payroll in response to meeting the additional administrative personnel described in RFQ 3.2.2. Exhibit 9-1 demonstrates our commitment to providing meaningful work share to our small business partners.

### Subcontracting Goals

ICF is committed to meeting DCA's small business goals for two reasons: (1) to support economic development by hiring and mentoring local firms and (2) to bring specialized state and neighborhood knowledge to the tasks. Our experience in CDBG-DR initiatives has taught us the importance of integrating local businesses into our team and assigning them a meaningful share of the work. Their expertise helps us succeed.

The following pages describe our subcontracting team and the work they will do. Our Subcontractor Utilization Form and copies of certifications from the New Jersey Division of Revenue as Small Business Enterprises are provided in Tab 11.

**EXHIBIT 9-1 ICF'S SUBCONTRACTING PARTNERS**

Subcontractor	Business Category	Project Support
<b>New Jersey Certified Small Business Subcontractors</b>		
<b>CPR</b> —NJ small business specializing in the treatment and conservation of archaeological materials	New Jersey Category I and Category IV Small Business	Archaeology and cultural history
<b>WarrenPro/PS&amp;S Global</b> —NJ certified SBE that specializes in waste, fraud and abuse of contractors in response to DR programs.	New Jersey Category II and Category IV Small Business	Waste, fraud, abuse monitoring and reporting
<b>Matrix New World</b> —NJ woman-owned full-service engineering and environmental services firm.	New Jersey Category III Small Business	Environmental services, staff augmentation for office support
<b>CCN Resources</b> —20 years providing direct hire and temp staff in NJ	New Jersey Category III Small Business	Staff for additional administrative personnel
<b>New Jersey Large Business Subcontractors</b>		
<b>AKRF, Inc.</b> —32 years of providing NEPA and a full range of environmental, planning, and engineering services	Large Business	CDBG, environmental services, task order managers, program support
<b>VHB</b> —34 years of providing NEPA and a full range of environmental, planning, and engineering services	Large Business	Environmental services, task order managers, program support

The following section describes our partners and further details on how they will contribute to this program.

- **AKRF, Inc.**— a multidisciplinary consulting firm specializing in planning, environmental, and engineering services. Founded in 1981, the firm brings together the talents of almost 200 employees in six locations—New Jersey, New York, Connecticut, and Maryland—to

complete a wide variety of projects for public agencies, private clients, and municipalities. AKRF will bring expertise and staff to provide support for environmental impact assessment and permitting, offering special expertise in the preparation of EISs, EAs, and categorical exclusions. AKRF regularly provides oversight and



management expertise to public agencies as they implement environmental regulatory policies.

- **CPR**—specializes in a wide range of conservation services including archaeological analysis, object identification and analysis, conservation surveys and assessments, development of conservation protocols, stabilization, conservation treatments, and restoration. They will provide support on specialized, complex reviews.
- **CCN Resources**—a full-service staffing firm with a wide array of staffing and contingent workforce management experience. They will support DEP providing additional administration staff. CCN currently works with ICF supporting DCA on similar staff augmentation assignments.
- **Matrix New World**—provides environmental, geotechnical, and civil engineering support. They will provide specialized expertise on complex programs and may support staff augmentation for DEP depending on task order requirements.
- **VHB**— has served as a consultant to Nassau County, NY, for its CDBG program for nearly four decades. The firm is currently providing planning services to Nassau County for post-Superstorm Sandy housing, economic development, infrastructure, and other projects receiving Federal relief funds through the State of New York. VHB prepared the CDBG-DR Housing Needs Assessment and is responsible for conducting environmental and historic reviews and addressing fair housing issues for the CDBG program on an ongoing basis. VHB also provides planning and NEPA environmental services to the Town of Hempstead, NY, for its CDBG program. VHB is a valuable source of lessons learned and will provide staff for specific assignments for specialized, complex reviews.
- **WarrenPro/PS&S Global**—will support the administrative functions for fraud, waste, and abuse and provide support for document management and records retention. They are a team of Storm Recovery and Catastrophic Event Remediation Professionals that support state and local officials on rapid, large-scale damage assessments caused by major storm events. Recent work is focused on post-storm related elements of infrastructure review, hazard mitigation, and public and individual assistance programs in association with FEMA.

## Good Faith Effort to Meet Performance Targets

**ICF's Project Manager is responsible for ensuring our team meets or exceeds small business subcontracting goals.** ICF has signed agreements with small businesses that meet Category I, II, and III requirements. Our Subcontractor Utilization Plan is included in Tab 11.

## Demonstration of Commitment to Small Business Targets

ICF has successfully managed contracts that include more than 100 subcontractors. In our more than 40 years of subcontractor management experience, we have demonstrated a strong commitment to small businesses. For example, ICF holds a current contract with the DHS for Radiological Emergency Preparedness that includes 53 subcontractors, 40 of which are small businesses. Another example can be seen in our small business contracting for EPA, where for over 10 years we have been averaging 60% of our subcontracted dollars set aside for small business, surpassing our goal of 50%. The EPA Office of Small Business Programs **awarded us its Director's Award for a specific** 5-year program where 100% of our subcontracts went to small businesses. We propose to do the same under this program.

## Participation in Mentor Protégé Programs

**As a further sign of ICF's commitment to small businesses and especially those owned by minorities, women, veterans, and persons with a disability, we support multiple Mentor-Protégé relationships across a number of Federal and state agencies.** One of our protégé partners, at the Department of Health and Human Services, is BCT Partners, a New Jersey-based subcontractor for this project.

ICF was one of the first in the **industry to participate in EPA's Mentor Protégé Program** by mentoring a Small Disadvantaged Veteran Owned Business, HeiTech Services, which has now graduated from the program and is thriving in the market as a large business. We mentored six other firms that graduated from this same EPA program, and we are currently in the process of establishing a new mentor-protégé agreement with another firm, Teracore.



## 10. Subcontractor References

### AKRF, Inc.

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**Client Reference:**

[REDACTED]  
Supervising Compliance Specialist  
Environmental Services Unit (NJ  
Transit)

**Brief Description of Work:**

As a sub to an engineering firm, AKRF is providing services to NJ Transit through a three-year, \$6 million environmental on-call for Hurricane Sandy Recovery and Resiliency Assignments contract. AKRF's role includes NEPA environmental reviews, cultural resources support, and Section 106 compliance and coordination.

**Client Reference:**

[REDACTED]  
NYS Department of State, Division of  
Local Government

**Brief Description of Work:**

AKRF is leading a multi-consultant project team as part of the NYRC) initiatives to prepare Reconstruction and Resiliency Plans for several communities throughout New York State that were damaged by storms Sandy, Irene, and Lee, as well as plans to deal with future natural disasters. The NYRC Plans are comprehensive documents that identify projects for reconstruction, how to build back better, and how to minimize future risks to community assets from extreme weather events. The NYRC Plans serve as the principle planning documents for communities to use for implementation funds. AKRF has worked closely with local communities to develop comprehensive and implementable plans integrate the communities' future and priorities, set the stage for stronger and more resilient communities in the face of increased risk of major storms, follow federal guidelines and national objectives in identifying projects, and incorporate global best practices in disaster response, economic development, and man-made and natural infrastructure resilience.

**Client Reference:**

[REDACTED]  
Project Director Capital Program  
(NYCEDC)

**Brief Description of Work:**

AKRF is part of a team working with NYCEDC and DPR to provide Engineering and Design Services related to the repair of damage to the Rockaway Beach boardwalk caused by Hurricane Sandy, as well as the implementation of resiliency measures. The project is being funded by a U.S. Department of Housing and Urban Development (HUD) Community Development Block Grant funds for disaster recovery (CDBG-DR), and entails the incorporation of various resiliency elements, making the boardwalk able to withstand storm and tidal forces which will impact the coastline in future years. The Project Site is approximately 4.7 Miles of shoreline in the Rockaways. In addition, the proposed project includes providing new temporary beach access across dunes being constructed by the US Army Corps of Engineers within a portion of the beach where there is no boardwalk. The design of the replacement boardwalk may incorporate a baffle-wall underneath the boardwalk that would prevent sand migration and help to protect the adjacent community. AKRF is preparing environmental review documents consistent with NEPA, SEQRA, and CEQR. AKRF is also preparing the Joint Application for permit under the NYSDEC tidal wetlands and coastal erosion management regulations.

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## CCN Resources

**Client Reference:**

Name: [REDACTED]  
Managing Partner Credit Suisse  
[REDACTED]

**Brief Description of Work:**

Haley Stuart Group's staffed a multi-shift document review project (for relevancy) comprised of 60 qualified individuals. The project was staffed within 4 days, and included comprehensive background checks (good-standing certification & conflict checking). The team included shift supervisors responsible for overseeing the work produced by individual team members. This project demonstrates CCN's ability to develop and deliver a large-scale, multi-faceted recruitment plan.

**Client Reference:**

[REDACTED]  
[REDACTED]

**Brief Description of Work:**

CCN built multifunctional legal team responsible for supporting partners and associates during complex litigation. This project demonstrates CCN's ability to develop and deliver a large-scale, multi-faceted recruitment plan.

**Client Reference:**

[REDACTED]  
MSP Program Manager,  
Contingent Workforce Solution  
Bristol Myers Squibb  
[REDACTED]

**Brief Description of Work:**

CCN continually built contingent workforce comprised of creative, administrative and operational personnel for multi-year engagements. This project demonstrates CCN's ability to recruit and retain a successful contingent worker team.

## CPR

**Client Reference:**

[REDACTED]  
Director, Public Archaeology Facility,  
Binghamton University  
[REDACTED]  
[REDACTED]

**Brief Description of Work:**

CPR performed faunal identifications, analysis and report preparation. Major sites include prehistoric and historic sites: the Wadsworth 2, Geneseo, NY; Lower Creek Road, Ithaca, NY; and the Bristol Avenue Site, Utica, NY.

**Client Reference:**

[REDACTED]  
President/Owner, Chrysalis  
Archaeological Consultants, Inc.  
[REDACTED]  
[REDACTED]

**Brief Description of Work:**

CPR performed archaeological conservation of selected items from an 18th century context at City Hall Park in Manhattan, NY. Also late 18th, early 19th century wooden water main pipes from several sites in Manhattan.

**Client Reference:**

[REDACTED], PhD, RPA  
President/Owner, Geoarchaeology  
Research Assoc.  
[REDACTED]  
[REDACTED]

**Brief Description of Work:**

CPR performed archaeological conservation of selected organic items such as leather, textiles and flora (food remains) materials from a 19th century context at a development project in Manhattan, NY.

## Matrix New World

**Client Reference:**

[REDACTED]  
Engineering Group  
Project Manager  
[REDACTED]  
[REDACTED]

**Brief Description of Work:**

New Jersey Transit, Lackawanna Cut-Off Project, Sussex and Morris Counties, NJ - Matrix provided environmental services related to the preparation of a Preliminary Assessment Report (PAR) and performance of an Environmental Site Investigation for the Lackawanna Cutoff Project. The Project Area occupies an 8.5 mile abandoned rail corridor running from the Port Morris Rail Yard



in Roxbury Township north through Byram Township and ending in the Borough of Andover. Proposed construction activities will include a passenger rail line along the existing abandoned Erie- Lackawanna rail bed, one station, and at-grade crossings.

**Client Reference:**

[REDACTED]  
Senior Associate

[REDACTED]

**Brief Description of Work:**

Metropolitan Transportation Authority/Long Island Rail Road, East Side Access Project, New Jersey/New York - Matrix is the MTA/LIRR East Side Access Task Manager for the Environmental Site Investigation (ESI), construction specifications, Construction Contaminant Management Plans (CCMP), environmental-related cost estimates and Remedial Action Workplan (RAWP) for several design packages including Grand Central Terminal, Arch Street, 63rd Street Yard A and Harold Interlocking.

**Client Reference:**

[REDACTED]  
Project Manager

[REDACTED]

**Brief Description of Work:**

NYC Department of Design and Construction, Geotechnical Inspection Services for Various Projects, New York, NY - Matrix has performed over 180 tasks for a multi-year indefinite quantity contract, which include the field oversight of land and water geotechnical borings, in-situ permeability testing, the preparation and coordination of laboratory testing of selected samples of soil and rock, and the preparation of records of the borings which include boring location plans, logs of the borings, and the results of the laboratory testing.

## Vanasse Hangen Brustlin, Inc.

**Client Reference:**

[REDACTED]  
Technical Director, Nassau County  
Office of Housing and  
Intergovernmental Affairs

[REDACTED]

**Brief Description of Work:**

VHB has served as a consultant to Nassau County for its Community Development Block Grant (CDBG) program for nearly four decades. Our firm is currently providing planning services to Nassau County for post-Sandy housing, economic development, infrastructure, and other projects receiving federal relief funds through the State of New York. We prepared the CDBG-DR Housing Needs Assessment used to demonstrate need and allocate disaster recovery funding. We are responsible for conducting environmental and historic reviews and addressing fair housing issues for the CDBG program on an ongoing basis.

**Client Reference:**

[REDACTED]  
Commissioner, Department of  
Planning and Economic  
Development, Town of Hempstead

[REDACTED]

**Brief Description of Work:**

VHB has served as a consultant to the Town of Hempstead for its Community Development Block Grant (CDBG) program for nearly four decades. Our firm maintains the NEPA Environmental Review Record for CDBG projects and prepares the Annual CDBG Program Application for federal funding through Nassau County. Our services have included revitalization strategies and implementation programs in low- and moderate-income target areas with a combination of new construction, rehabilitation, and infrastructure projects, along with the provision of public services and economic development opportunities.

**Client Reference:**

[REDACTED]  
Executive Director, Town of Islip  
Community Development Agency

**Brief Description of Work:**

VHB prepared the Analysis of Impediments to Fair Housing Choice on behalf of the Town of Islip Community Development Agency as part of the 2010-2014 Consolidated Strategy and Plan. The



(631) 665-1185  
pfink@islipcda.org

analysis consisted of three crucial components: identification and analysis of six impediments to fair housing choice in the Town of Islip; actions taken to overcome the effects of the identified impediments; and documentation of the results of actions initiated to minimize the impact of the identified impediments.

## WarrenPro/PS&S Global

**Client Reference:**

[REDACTED]  
Executive Director, Essex County  
Improvement Authority

**Brief Description of Work:**

**WarrenPro performed services for ECIA.**

**Client Reference:**

[REDACTED]  
Attorney, DiFrancesco, Bateman et.  
al.

**Brief Description of Work:**

WarrenPro performed projects related to Superstorm Sandy reconstruction as engineer and architects.

**Client Reference:**

[REDACTED]  
Attorney, Wolff and Samson

**Brief Description of Work:**

WarrenPro performed projects related to Superstorm Sandy reconstruction as engineer and architects.



## 11. Forms Required With Quotation (4.1.12)

The unprecedented damage caused by Superstorm Sandy to New Jersey's housing, business, infrastructure, health, social service, and environmental sectors has placed enormous pressures on the State to facilitate the distribution of recovery aid in a timely manner. With federal assistance comes complex rules for environmental review, historic preservation studies, compliance with building codes and elevation rules, and other requirements that must be met as a condition for disbursement. Providing CDBG-DR assistance quickly while complying with federal environmental requirements will be in dynamic tension and requires a contractor with a proven track record for performance doing this work.

The ICF team brings unmatched expertise that will enable DEP to achieve the goals of the contract efficiently and effectively. Highlights of our strengths include:

- Scott Ledford, our proposed Project Manager, and members of our core management team, including Neil Sullivan and Richard Starzak, have been working in New Jersey since early 2013 to assist with initial process flows and CDBG program design considerations, including environmental review and Section 106 compliance processes; thus minimizing start-up risk.
- ICF has been working with HUD on the CDBG program since 1987. Two of our key team members, Charlie Bien and Cathy Dymkoski, are former HUD officers responsible for establishing 24 CFR Part 50 and Part 58 review requirements. Our staff has provided training courses on environmental compliance with HUD regulations and has successfully performed reviews on complex and controversial projects.
- Richard Starzak, our Historic Preservation Manager, has conducted Section 106 and SHPO consultation in 44 states, including New Jersey. He has been instrumental in developing a streamlined system for compliance that has expedited the process and saved our clients on consultant costs.
- Our team has written CDBG program training guides, supported states receiving CDBG funding, and have extensive experience in CDBG program management. We have worked with FEMA since 2000, including **projects requiring compliance with FEMA's 44 CFR Part 10 regulations.**
- ICF was one of the first firms to provide clients with NEPA compliance consultation. We have completed thousands of legally defensible NEPA documents and delivered hundreds of NEPA compliance courses across the country to federal, state, and local agencies.
- ICF is not an EAF Contractor, allowing us to step in on day one and begin to assess the more than 2,600 environmental documents already completed without having to recuse ourselves and eliminating the potential added burden to DEP presented by offerors with a conflict of interest.

In response to this RFQ, we have assembled a team with unparalleled knowledge of HUD and other federal regulations. Our depth of staff, skills, expertise, and our established management approach will enable DEP to ensure a fully compliant environmental review process for Superstorm Sandy recovery.

The information below presents an overview of our price for this engagement. **Our price is based on ICF's** experience providing program management support, IT solutions development, disaster preparedness and



recovery support, and environmental and historic preservation policy, assessment, and strategic advisory services to large federal, regional, and statewide programs.

**ICF's proposal to complete this work contains both Firm-Fixed Price (FFP) and All-Inclusive Hourly Rate components, as defined in the Request for Quotation (RFQ). Our price offer is based on the anticipation of a single-award contract for the execution of services described in the RFQ Scope of Work (SOW), clarifications provided in Modifications 1-5 to the RFQ, and our technical approach provided in Tabs 1, 2, and 3 of our proposal submittal.**

The information below presents an overview of our price for this engagement. **Our price is based on ICF's experience providing program management support, IT solutions development, disaster preparedness and recovery support, and environmental and historic preservation policy, assessment, and strategic advisory services to large federal, regional, and statewide programs.**

**ICF's proposal to complete this work contains both Firm-Fixed Price (FFP) and All-Inclusive Hourly Rate components, as defined in the RFQ. Our price offer is based on the anticipation of a single-award contract for the execution of services described in the RFQ Scope of Work (SOW), clarifications provided in Modifications 1-5 to the RFQ, and our technical approach provided in Tabs 1, 2, and 3 of our proposal submittal.**

## 11.1 General Information

### Period of Performance

The proposed period of performance is as follows:

Year 1: April 1, 2014 – March 31, 2015

Year 2: April 1, 2015 – March 31, 2016

Year 3: April 1, 2016 – March 31, 2017

Per the RFQ, there may be up to two (2), additional one-year extensions.

### Contract Type

If selected as the successful bidder, ICF will perform the services described in the RFQ under a Firm Fixed Price and All-Inclusive Hourly Rate contract.

### Validity

**ICF's price proposal will remain in effect for a period of sixty (60) days from the date of submission. ICF reserves the right to review its submission and to extend its offer or to revise its proposal based on the facts known at the end of the 60-day period.**

## 11.2 Subcontractors

As encouraged by the DEP in Section 1.6 of the RFQ, ICF has established a goal of 25% for use of subcontractors that are registered with the NJ Division of Revenue as Small Business Enterprises, with a minimum of 5% of contract value to New Jersey certified Category I firms, 5% to Category II firms that specialize in housing and community planning, and 5% to Category III staff augmentation firms. The remaining 10% or more will be set

aside to small businesses who will be engaged based on the evolution of the program. The Subcontractor Utilization Plan is provided in Attachment 3.

Our subcontractor team consists of four registered New Jersey small businesses. In addition, we have included two large businesses registered in New Jersey that provide specialized expertise for this program. We estimate the value of our planned subcontracts to New Jersey based small businesses to be 21% of the estimated value of support provided under Schedule 1, and will utilize our New Jersey small businesses under Schedule 2 to achieve the remainder of our small business goal.

### 11.3 Basis of Estimate

ICF's proposed cost quotation is based on ICF's experience performing similar work for a variety of clients. It also reflects our understanding of this work as a program management services contract requiring senior, experienced staff to respond to Task Orders as well as the requirement to augment State staff capacity.

For the purpose of developing our price quotation, ICF has utilized discounted schedule rates from its GSA Environmental Services (ES) Contract #GS-10F-0124J and its GSA General Purpose Commercial Information Technology Equipment, Software, and Services (IT) Contract #GS-3 5F-4121D. We have mapped all proposed staff providing support to DEP under Schedules 1 and 2 to the appropriate labor category on the relevant GSA schedule, as well as in Schedule 2 of the RFO, and developed a blended category rate based on the level of effort of **proposed staff in each category**. ICF's offer includes discounts ranging from 5% to 36% off its schedule rates in order to provide the best value to DEP.

The current ES Schedule option period is set to expire 6/13/2014. As such, ICF will be negotiating an extension to our ES Schedule in accordance with Clause I-FSS-163 (Option to Extend the Term of the Contract [Evergreen]). Once the extension is negotiated, ICF will have negotiated prices that cover the entire task order period of performance for this solicitation. If, as a result of negotiations with GSA, a lower labor category rate is negotiated for the period of performance, the proposed Schedule 2 task order rates will be adjusted to reflect the lower negotiated rate. If a higher rate is negotiated with GSA, ICF will honor the proposed rates contained in this submission, and no upward adjustment will be requested.

#### REASONABLENESS AND REALISM

The reasonableness of our estimate is demonstrated by two facts. First, we have seven (7) years of corporate experience supporting large disaster recovery projects following hurricanes Katrina and Rita and are well versed in the cost of providing such support. We know the salary levels of qualified staff, understand the pricing offered by subcontractors operating in this arena, and are very familiar with the cost of the business processes that support management of such a contract. In addition, our experience providing similar services to other State and federal clients allows us to apply cost efficiencies achieved through the course of the project and therefore provides additional assurance that the discounts offered as work progresses will not come at the expense of quality of service. In short, by selecting ICF for this procurement, DEP will get a superior technical solution at a very competitive price.

## 11.4 Cost Quotation

ICF's cost quotation and supporting materials can be found in the following exhibits:

- Exhibit 11-1 provides Cost Quotation Price Schedule1 Program Manager – Firm Fixed Pricing
- Exhibit 11-2 provides Cost Quotation Price Schedule 2 Program Manager – All-Inclusive Hourly Rate Pricing
- Exhibit 11-3 provides a cross walk of labor categories in the RFQ to our GSA ES and IT Schedule rates to the labor categories.
- Exhibit 11-4 provides a deliverable schedule to match Cost Quotation Price Schedule1 Program Manager – Firm Fixed Pricing.

**EXHIBIT 11-1 COST QUOTATION PRICE SCHEDULE 1 PROGRAM MANAGER – FIRM FIXED PRICING**

Line No.	Description	Unit	Quantity (A)	Year 1 (B)	Year 1 Total (A) * (B)	Year 2 (C)	Year 2 Total (A) * (C)	Year 3 (D)	Year 3 Total (A) * (D)
1	Core Program Management -Start-up Section 3.1.1.3	Task	1	\$ 204,815	\$ 204,815	N/A	N/A	N/A	N/A
2	Core Program Management Operations Sections 3.1.1.2; 3.1.2; 3.1.3; 3.1.4; 3.3.1; 3.3.2; 3.41.; 3.4.3; 3.4.6 thru 3.4.8	Month	12	\$ 705,242	\$ 8,462,904	\$ 151,348	\$ 1,816,176	\$ 107,004	\$ 1,284,048
3	Core Program Management Operations - State Historic Preservation Office Section 3.2.1	Month	12	\$ 151,541	\$ 1,818,492	\$ 148,976	\$ 1,787,712	\$ 153,429	\$ 1,841,148
4	Training Section 3.3.3	Task	1	\$ 13,666	\$ 13,666	\$ -	\$ -	\$ -	\$ -
5	Document Management & Retention Section 3.4.5	Month	12	\$ 16,589	\$ 199,068	\$ 16,286	\$ 195,432	\$ 16,750	\$ 201,000



**EXHIBIT 11-2 COST QUOTATION PRICE SCHEDULE 2 PROGRAM MANAGER – ALL-INCLUSIVE HOURLY RATE PRICING**

Line No.	Labor Title	Hourly Rate Year 1	Hourly Rate Year 2	Hourly Rate Year 3
<b>Office, Management, and IT Staff</b>				
6	Project Manager	\$ 197.55	\$ 203.48	\$ 209.58
7	Assistant Project Manager	\$ 161.43	\$ 166.27	\$ 171.26
8	Company Chief Executive	\$ 254.01	\$ 261.63	\$ 269.48
9	Program Development Specialist	\$ 171.53	\$ 176.68	\$ 181.98
10	Facilities Operations Manager	\$ 122.53	\$ 126.21	\$ 130.00
11	Information Technology Manager	\$ 169.39	\$ 174.47	\$ 179.70
12	Data Base Manager	\$ 150.27	\$ 154.78	\$ 159.42
13	Programmer 1 – Senior Level	\$ 111.38	\$ 114.72	\$ 118.16
14	Programmer 2 – Junior Level	\$ 75.04	\$ 77.29	\$ 79.61
15	Administrative Support Staff/Data Entry	\$ 59.96	\$ 61.76	\$ 63.61
16	Chief Accountant	\$ 170.38	\$ 175.49	\$ 180.75
17	Staff Accountant	\$ 105.42	\$ 108.59	\$ 111.85
18	Accounting Assistant	\$ 59.42	\$ 61.20	\$ 63.04
19	Contract Manager	\$ 144.97	\$ 149.32	\$ 153.80
20	Historic Preservation Specialist 1	\$ 166.90	\$ 171.90	\$ 177.06
21	Historic Preservation Specialist 2	\$ 111.67	\$ 115.02	\$ 118.47
22	Architect	\$ 180.97	\$ 186.39	\$ 191.98

Note: Option year pricing (Years 4 and 5) will remain consistent with the all-inclusive hourly rates in effect for the last year of the contract's base period.

**EXHIBIT 11-3 RFQ LABOR CATEGORY MAPPING TO ES AND IT SCHEDULES**

Line No.	Labor Title	ICF Labor Category	ICF GSA Schedule
<b>Office Management, and IT Development Staff</b>			
6	Project Manager	Senior Consultant IV	Environmental Services
7	Assistant Project Manager	Senior Consultant VI	Environmental Services
		Senior Consultant IV	Environmental Services
		Senior Consultant II	Environmental Services
		Senior Consultant I	Environmental Services
8	Company Chief Executive	Principal Consultant IV	Environmental Services
9	Program Development Specialist	Senior Consultant VI	Environmental Services
		Senior Consultant V	Environmental Services
		Senior Consultant IV	Environmental Services
		Senior Consultant III	Environmental Services
		Senior Consultant I	Environmental Services
10	Facilities Operations Manager	Consultant IV	Environmental Services
11	Information Technology Manager	Principal Software Engineer - ICF Site	IT Schedule 70
12	Data Base Manager	Senior Systems Analyst - ICF Site	IT Schedule 70
13	Programmer 1 – Senior Level	Senior Software Engineer - ICF Site	IT Schedule 70
14	Programmer 2 – Junior Level	Software Engineer - ICF Site	IT Schedule 70
		Junior Software Engineer - ICF Site	IT Schedule 70
15	Administrative Support Staff/Data Entry	Clerical Support II	Environmental Services
16	Chief Accountant	Senior Consultant II	Environmental Services
17	Staff Accountant	Consultant II	Environmental Services
18	Accounting Assistant	Junior Consultant II	Environmental Services
		Junior Consultant I	Environmental Services
19	Contract Manager	Senior Consultant V	Environmental Services
20	Historic Preservation Specialist 1	Senior Consultant VI	Environmental Services
		Senior Consultant IV	Environmental Services
21	Historic Preservation Specialist 2	Senior Consultant III	Environmental Services
		Senior Consultant II	Environmental Services
		Consultant I	Environmental Services
		Junior Consultant II	Environmental Services
22	Architect	Senior Consultant VII	Environmental Services

**EXHIBIT 11-4 DELIVERABLE SCHEDULE-SCHEDULE 1 PROGRAM MANAGER – FIRM FIXED PRICING**

Deliverable Name	Artifact	Delivery Date
<b>Line1: Core Program Management Start-Up (3.1.1.3)</b>		
<b>DEP Task Order Review/ Procedures Recommendation Report</b>	Report	Within 15 days of Contract Execution
<b>Establish an Office Near Trenton</b>	Local Office Certificate of Occupancy	Within 13 days of Contract Execution
<b>Assume Program Management Services of Environmental and Historic Preservation Review Program</b>	At End of the Start-up Period	Within 15 days of Contract Execution
<b>Meet with EAF Contractors</b>	Meeting	Within 14 days of Contract Execution
<b>Assess Completed ERRs for Completeness and Accuracy</b>	Compliance Checklist for Each ERR	Within 15 days of Contract Execution
<b>DEP Standardized Forms and Operating Processes Recommendation Report</b>	Report	Within 15 days of Contract Execution
<b>Line 2: Core Program Management Operations (Sections 3.1.1.2; 3.1.2; 3.1.3; 3.1.4; 3.3.1; 3.3.2; 3.4.1; 3.4.3; 3.4.6 thru 3.4.8)</b>		
<b>3.1.1.2 Core Program Management Operations</b>		
<b>Meet with DEP and Cooperating agencies</b>	Meeting	Ongoing
<b>Memo Recommending Appropriate Level of Environmental Reviews for New Programs under amended Action Plan</b>	Memo	Within 3 Months of Contract Execution
<b>Memo Recommending Process Improvements to EAF Contractors</b>	Memo	Within 3 Months of Contract Execution
<b>3.1.2 Use of Existing IT Systems for Workflow, ER Processing and Data Capture/Digital Integration</b>		
<b>Screen Shots for Program Management Functions Using Office 365</b>	Report of Screen Shots	Within 30 Days of Contract Execution
<b>Provide Electronic Interface between ERMS and ICF Data System</b>	Sample Report of Data from ICF Data System	Within 30 Days of ERMS Activation
<b>Provide Electronic Interface between SIROMS and ICF Data System</b>	Sample Report of Data from ICF Data System	Within 30 Days of SIROMS Activation
<b>3.1.3 Use of Contractor's Existing IT System</b>		
<b>Provide up to 125 Microsoft Office 365 Licenses</b>	Certificate of Purchase	Within 15 days of Contract Execution
<b>Provide up to 5 Tableau Licenses</b>	Certificate of Purchase	Within 15 days of Contract Execution
<b>Web-based Dashboard Providing Key Application and Review Metrics</b>	Report of Screen Shots from the Dashboard	Within 30 Days of ERMS and SIROMS Activation
<b>3.1.4 Core Program Management Operations – Environmental Reviews</b>		
<b>Prepare Task Orders for State Contract Manager's Approval and Issuance to EAF Contractor</b>	Task Order Recommendation Report	Rolling Submissions (Years 1 and 2)
<b>Review up to 12,000 Tier 2 ERRs</b>	Tier 2 Compliance	Rolling Submissions (Years 1 and 2)

<b>Associated DCA Action Plan—RREM Program for Completeness and Quality of Data</b>	Checklist	
<b>Review up to 3,000 Non-Tier 2 DCA Action Plan Program ERRs for Completeness and Quality of Data</b>	Tier 1 Compliance Checklists, Categorical Exclusions, and Full EAs (as needed)	Rolling Submissions (Years 1 and 2)
<b>Review up to 5,400 Tier 2 ERRs Associated with the Programs Contained in <i>Action Plan Amendment Number 7</i> for Completeness and Quality of Data</b>	Tier 2 Compliance Checklist	Rolling Submissions (Years 1 and 2)
<b>Review up to 625 Non-Tier 2 ERRs Associated with the Programs Contained in <i>Action Plan Amendment Number 7</i> for Completeness and Quality of Data</b>	Tier 1 Compliance Checklists, Categorical Exclusions, and Full EAs (as needed)	Rolling Submissions (Years 1 and 2)
<b>3.3.1 Meetings</b>		
<b>Conduct Weekly Meetings (via teleconference) among EAF Contractors and State Contract Manager</b>	Meeting	Weekly or More Frequently As Needed
<b>Weekly Meetings (via teleconference or in-person) with State Contract Manager</b>	Meeting	Weekly or More Frequently As Needed
<b>Periodic Meetings among SHPO, DEP historic preservation staff, EAF Contractors</b>	Meeting	As Needed
<b>3.3.2 Communications</b>		
<b>Communications Plan</b>	Plan	Within 30 Days of Contract Execution
<b>3.4.1 Quality Assurance/Quality Control</b>		
<b>Develop QA/QC Methodology</b>	Methodology Report	Within 3 Months of Contract Execution
<b>Develop Standard Checklist for ERRs</b>	Checklist Report	Within 3 Months of Contract Execution
<b>Report Quality Check Results</b>	Report	Monthly
<b>Document Internal Operations and Recommendations for Improvements</b>	Memo	Within 3 Months of Contract Execution
<b>Develop Operational Processes for EAF Contractors</b>	Process Report	Within 3 Months of Contract Execution
<b>Perform Analytics on Compliance and Develop Investigative Methods for Errors and Omissions</b>	Compliance Report	Monthly
<b>Governor's EO 125 Compliance</b>	Compliance Report	Monthly
<b>3.4.3 Compliance and Monitoring</b>		
<b>Establish Process for Compliance, Monitoring, and Reporting</b>	Process Model	Within 2 Months of Contract Execution
<b>ERR Compliance and Monitoring Findings</b>	Findings Report	Weekly
<b>Report on Issues Associated with Quality and Completeness of ERRs</b>	Issues Report	Monthly



<b>3.4.6 Accounting and Reporting</b>		
<b>Electronic Data Set of Key Financial and Operations Metrics for Upload into the DRGR System</b>	Data Set	Within 30 days of ERMS and SIROMS activation — monthly
<b>3.4.7 Reporting and Documentation</b>		
<b>Weekly Performance Reports of Applications in Process,</b>	Report	Within 30 days of ERMS and SIROMS activation — weekly
<b>Monthly EAF Contractor Reports</b>		
<b>EAF Compliance Report</b>	Report	Within 30 days of ERMS and SIROMS activation — weekly
<b>Monthly Summary of EAF Compliance</b>	Report	Within 30 days of ERMS and SIROMS activation — monthly
<b>Monthly Quality Assurance Evaluation of EAF Work Products</b>	Report	Within 30 days of ERMS and SIROMS activation — monthly
<b>Reconciliation Report of EAF Payments Against Work Performed</b>	Reconciliation Report	On an Agreed to Periodic Basis
<b>Report of Requests for Reimbursement Requests Submitted to DCA</b>	Reimbursement Request Report	Within 30 days of ERMS and SIROMS activation — monthly
<b>Report of Invoices From and Payments to EAF Contractors</b>	Report	Within 30 days of ERMS and SIROMS activation — monthly
<b>Disbursements Report</b>	Report	Within 30 days of ERMS and SIROMS activation — monthly
<b>Budgets and Cashflow Report</b>	Report	Within 30 days of ERMS and SIROMS activation — monthly
<b>Report of Small Business Sub-contracting Plan Performance</b>	Report	Quarterly
<b>Status and Progress Report on Workflow of Applications or Projects</b>	Report	On an Agreed to Periodic Basis
<b>3.4.8 Deliverable Milestones and Performance Guarantees</b>		
<b>Daily Performance Report</b>	Report	Daily, following Project Start-up Period
<b>Line 3: Core Program Management Operations - State Historic Preservation Office (3.2.1)</b>		
<b>Provide Eight (8) Qualified Personnel to assist the Historic Preservation Office</b>	Staff Report to SHPO Office in Trenton	Within 15 days of Contract Execution
<b>Line 4: Training (3.3.3)</b>		
<b>Training Plan</b>	Report	Within 30 Days of Contract Execution
<b>Line 5: Document Management &amp; Retention (3.4.5)</b>		
<b>Records Retention Plan, Including Procedures and Guidelines</b>	Report	Within 30 Days of Contract Execution
<b>Disaster Recovery Plan</b>	Report	Within 2 Months of Contract Execution
<b>Reports to State Contract Manager</b>	Report	As Requested

## **11.6 Attachments**

### **Attachment 1: New Jersey Disclosure Forms**

Ownership Disclosure Form

Disclosure of Investigations and Other Actions Involving Bidder Form

Disclosure of Investment Activities in Iran Form

### **Attachment 2: Certification of MacBride Principles and Northern Ireland Act of 1989**

### **Attachment 3: Subcontractor Commitment Letters**

Subcontractor Utilization Form

Other Subcontractor Data

### **Attachment 4: Subcontractor Forms**

### **Attachment 5: New Jersey Standard Terms and Conditions**

### **Attachment 6: Source Disclosure Certification Form**

### **Attachment 7: Two Year Chapter 51/EO 117 Vendor Certification and Disclosure of Political Contributions, Affirmative Action Report and New Jersey Business Registration**



**U.S. Department of Housing and Urban Development**

San Francisco Regional Office - Region IX  
600 Harrison Street  
San Francisco, California 94107-1387  
www.hud.gov  
espanol.hud.gov

**LEVEL OF ENVIRONMENTAL REVIEW DETERMINATION:** (2010)

**Project Name / Description:**

**Professional Housing and Development Apartments Project**

The proposed project involves acquisition and rehabilitation of 83 existing affordable housing units located on 5 separate properties. The property addresses are 1400 S. Kenmore Avenue, 1401 S. Arlington Avenue, 1810 S. Magnolia Avenue, 1020 Kingsley Drive, and 1745 W. 20<sup>th</sup> Street in the Koreatown neighborhood in the City of Los Angeles.

**Level of Environmental Review (cite regulation):**

**Categorical Exclusion (CE) pursuant to 24 CFR Part 58 § 58.35 (a)(3)(ii)(A)(B)(C)**

(Exempt per 24 CFR 58.34, Categorically excluded not subject to statutes per § 58.35(b), Categorically excluded subject to statutes per § 58.35(a), Environmental Assessment per § 58.36, or EIS per 40 CFR 1500)

**STATUTES and REGULATIONS listed at 24 CFR 58.6**

**FLOOD INSURANCE / FLOOD DISASTER PROTECTION ACT**

1. Does the project involve the acquisition, construction or rehabilitation of structures, buildings or mobile homes?

( ) No; flood insurance is not required. The review of this factor is completed.  
(X) Yes; continue.

2. Is the structure or part of the structure located in a FEMA designated Special Flood Hazard Area?

(X) No. Source Document (FEMA/FIRM floodplain zone designation, panel number, date):  
Zone X (shaded and unshaded), FIRM Panel 1620 of 2350 and 1615 of 2350, Effective September 28, 2009 (Factor review completed).

( ) Yes. Source Document (FEMA/FIRM floodplain zone designation, panel number, date):  
(Continue review).

3. Is the community participating in the National Insurance Program (or has less than one year passed since FEMA notification of Special Flood Hazards)?

( ) Yes - Flood Insurance under the National Flood Insurance Program must be obtained and maintained for the economic life of the project, in the amount of the total project cost. A copy of the flood insurance policy declaration must be kept in the Environmental Review Record.  
( ) No (**Federal assistance may not be used in the Special Flood Hazards Area**).

**COASTAL BARRIERS RESOURCES ACT**

1. Is the project located in a coastal barrier resource area? (See [www.fema.gov/nfip/cobra.shtm](http://www.fema.gov/nfip/cobra.shtm)).

(X) No; Cite Source Documentation:

California does not contain Coastal Barrier Resources

Source: [http://www.fws.gov/habitatconservation/coastal\\_barrier.html](http://www.fws.gov/habitatconservation/coastal_barrier.html), Accessed May 21, 2010

(This element is completed).

( ) Yes - **Federal assistance may not be used in such an area.**

**AIRPORT RUNWAY CLEAR ZONES AND CLEAR ZONES DISCLOSURES**

1. Does the project involve the sale or acquisition of existing property within a Civil Airport's Runway Clear Zone, Approach Protection Zone or a Military Installation's Clear Zone?

( X ) No; cite Source Document, page:

According to the City of Los Angeles Zoning Information and Map Access System (ZIMAS) the subject property is not located within an airport hazard zone. Source: <http://zimas.lacity.org/>. In addition, the subject property is located approximately 15 miles from the nearest Airport and therefore is not within 2,500 feet of the end of a civil airport runway or 8,000 feet of the end of a military airfield runway. Project complies with 24 CFR 51.303(a)(3).

( ) Yes; **Disclosure statement must be provided** to buyer and a copy of the signed disclosure statement must be maintained in this Environmental Review Record.



Peter Feldman

May 24, 2010

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Preparer Signature / Name /Date

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Responsible Entity Official Signature / Title/ Date



# STATUTORY WORKSHEET

[HUD Region IX Recommended Format -Revised December 2003– previous versions are obsolete]

Use this worksheet only for projects that are Categorically Excluded per 24 CFR Section 58.35(a).  
(Note: Compliance with the laws and statutes listed at 24 CFR §58.6 must also be documented).

## **24 CFR §58.5 STATUTES, EXECUTIVE ORDERS & REGULATIONS**

### **Professional Housing and Development Apartments**

The proposed project would include the acquisition and rehabilitation of 83 affordable housing residential units located on 5 separate properties. The property addresses are 1400 S. Kenmore Avenue, 1401 S. Arlington Avenue, 1810 S. Magnolia Avenue, 1020 Kingsley Drive, and 1745 W. 20<sup>th</sup> Street in the Koreatown neighborhood in the City of Los Angeles (See Figures 1 and 2). Under the proposed project, rehabilitation of the existing units would result in 54 efficiency units, 27 one-bedroom, and 2 two-bedroom units. The proposed improvements would include replacement of interior and exterior paint; roof, window, thermostat, cabinet, and bathtub replacement; carpet replacement in some units; seismic retrofitting, water efficient fixtures and plumbing installation; energy star appliance installation; and removal of asbestos containing materials (ACM) and lead-based paint (LBP) from each property. Existing tenants at each of the five properties would not be displaced or relocated as a result of the proposed project though temporary relocation of some tenants for approximately 3-12 days would be required during removal of hazardous ACM and LBP. The project proponent would compensate any relocation expenses incurred by tenants during this time.

The proposed project is the undertaking of three organizations-Little Tokyo Service Center Community Development Corporation (LTSC CDC), East Los Angeles Community Corporation (ELACC), and Koreatown Youth and Community Center (KYCC). LTSC CDC is the current owner of the properties. Under the proposed project, a limited partnership would be developed and ownership would be given.

This proposal is determined to be categorically excluded according to: **24 CFR Sec 58.35(a)(3)(ii)**

**DIRECTIONS** - Write “**A**” in the Status Column when the proposal, by its scope and nature, does not affect the resources under consideration; OR write “**B**” if the project triggers formal compliance consultation procedures with the oversight agency, or requires mitigation (see Statutory Worksheet Instructions). Compliance documentation must contain verifiable source documents and relevant base data.

**Compliance Factors:**

Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5	Status A / B	Compliance Determination & Documentation
--	-----------------	--

Historic Preservation [36 CFR Part 800]	A	As the project involves federal funding, compliance with Section 106 of the National Historic Preservation Act is required. The property located at 1745 W. 20 <sup>th</sup> Street contains a one-story multiple family courtyard apartment complex consisting of multiple buildings. The 1400 S. Kenmore Avenue and 1810 S. Magnolia Avenue properties are occupied by two-story apartment buildings. The 1401 S. Arlington Avenue property is occupied by a two-story multi-family residence. The 1020 S. Kingsley Drive property contains a three-story multiple family apartment building. Jones & Stokes conducted a Section 106 review of the structures located on the five properties in December 2007 and concluded that none of the properties in the APE are eligible for listing in the National Register of Historic Places either individually or as a contributor to a potential National Register
--	---	--

		eligible historic district. (See Appendix A)
Floodplain Management [24 CFR 55, Executive Order 11988]	A	According to the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM) numbers 06037C1620F and 06037C1615F, updated 09/26/2008 each of the properties proposed for rehabilitation lie within "Zone X" with one property, 1745 20 <sup>th</sup> Street, within "Zone X (shaded)". Zone X (shaded) is classified as "other flood areas" or areas with 0.2% annual chance of flood, areas of 1% annual chance of flood with average depths of less than 1 foot or with drainage areas less than 1 square mile; and areas protected by levees from 1% annual chance of flood. Zone X (shaded) is considered an area of moderate flood hazard, usually describing areas between the levels of 100-year and 500-year floods. Zone X (unshaded) describes areas of minimal flood risk above the 500-year flood level. (See Appendix B for copy of FIRM numbers 06037C1620F and 06037C1615F).
Wetland Protection [Executive Order 11990]	A	The subject properties are located within and adjacent to the Koreatown area in the City of Los Angeles, a highly urbanized setting where there are no wetlands, riparian habitats, or other bodies of water which may support sensitive wetland habitat in the vicinity. These findings are based on a search conducted May 19, 2010, using the Wetlands Online Mapper of the U.S. Fish and Wildlife Service ( <a href="http://wetlandsfws.er.usgs.gov/imf/imf.jsp?site=NWI_CONUS">http://wetlandsfws.er.usgs.gov/imf/imf.jsp?site=NWI_CONUS</a> ).
Coastal Zone Management Act [Sections 307(c), (d)]	A	The subject properties do not lie within the Coastal Zone. The project sites are located approximately 15 miles east of the nearest coastal zone in Santa Monica as identified on the Local Coastal Program (LCP) Status Maps for the South Coast areas, effective July 1, 2009 ( <a href="http://www.coastal.ca.gov/lcp/lcpstatus-map-sc.pdf">http://www.coastal.ca.gov/lcp/lcpstatus-map-sc.pdf</a> ) and confirmed by parcel profiles found on the subject property's ZIMAS information pages ( <a href="http://zimas.lacity.org/">http://zimas.lacity.org/</a> ).
Sole Source Aquifers [40 CFR 149]	A	The subject sites are located within Los Angeles County. Los Angeles County is not one of the three counties (Fresno, Santa Cruz, and Butte Counties) in California that contain designated sole-source aquifers. These findings are based on a review conducted May 19, 2010, of the EPA website ( <a href="http://www.epa.gov/safewater/sourcewater/pubs/qrg_ssamap_reg9.pdf">http://www.epa.gov/safewater/sourcewater/pubs/qrg_ssamap_reg9.pdf</a> )

<p>Endangered Species Act [50 CFR 402]</p>	<p>A</p>	<p>A review of the California Department of Fish and Game California Natural Diversity Database (CNDDDB) was conducted on May 17, 2010. According to the review there is presence, within 0.25 mile of each of the subject properties, of three species listed as either endangered or threatened on either the federal or state endangered species lists. The CNDDDB search found that there is the potential for the following endangered or threatened species to be present on the project sites: burrowing owl (<i>Athene cunicularia</i>), southwestern willow flycatcher (<i>Empidonax traillii extimus</i>), and the American badger (<i>Taxidea taxus</i>). (See Appendix C)</p> <p>The property sites are located in a fully developed urban area; therefore, few suitable open space habitats are available for wildlife in the immediate vicinity of the subject properties. No impacts related to habitats or endangered or threatened species are expected to occur as construction activities involve only minor rehabilitation of existing multi-family housing units.</p>
<p>Wild and Scenic Rivers Act [Sections 7(b), and (c)]</p>	<p>A</p>	<p>The City of Los Angeles does not contain any listed wild and/or scenic rivers in the National Wild and Scenic Rivers System. The closest river to the project area is the Los Angeles River located approximately 3miles east of the project sites; however, the Los Angeles River contains numerous manmade features and little scenic value making it ineligible for inclusion in the National Wild and Scenic Rivers System. Therefore, the project would not have an effect on the natural, free flowing, or scenic qualities of a river in the National Wild and Scenic Rivers System. These findings are based on a review of the National Wild and Scenic Rivers website, last modified on May 20, 2010. Available: <a href="http://www.rivers.gov/wildriverslist.html">http://www.rivers.gov/wildriverslist.html</a></p>
<p>Clean Air Act - [Sections 176(c), (d), and 40 CFR 6, 51, 93]</p>	<p>A</p>	<p>The project sites are located in the South Coast Air Quality Basin, which does not meet several federal air quality standards (the Basin is designated a non-attainment area for ozone, carbon monoxide, and PM<sub>10</sub> [particulate matter 10 microns or less in diameter]). The proposed project would include improvements to existing affordable housing units. The proposed improvements would increase energy efficiency and sustainability of the buildings. Under the proposed project, the buildings would continue to be used for residential use, and it is not anticipated that the nature of the</p>

		project would worsen air quality conditions.
Farmland Protection Policy Act [7 CFR 658]	A	The project lies within a highly urbanized area. No agricultural uses exist on the project sites or in their vicinity. The project area does not include prime or unique farmland, or other farmland of statewide or local importance. These findings are based on a review conducted May 19, 2010, of the State Farmland Mapping and Monitoring Program maps for the County of Los Angeles. Available: ( <a href="ftp://ftp.consrv.ca.gov/pub/dlrp/FMM/P/pdf/2006/los06.pdf">ftp://ftp.consrv.ca.gov/pub/dlrp/FMM/P/pdf/2006/los06.pdf</a> )
Environmental Justice [Executive Order 12898]	A	The proposed project consists of five parcels located within and adjacent to the Koreatown area in the City of Los Angeles. These parcels are currently occupied by affordable housing units. Under the proposed project, this use would not change; rather units would be improved and preserved. The proposed improvements would include new water efficient appliances and fixtures thereby improving energy efficiency and sustainability of the existing buildings. Additional improvements would include unit and common area repairs. Some existing tenants would be temporarily relocated for a period of 3 to 12 days during removal of hazardous materials; however, the project proponent will accommodate and compensate any relocation expenses incurred by tenants during this time. In the absence of the proposed project, the site may remain unchanged but may continue to deteriorate or dilapidate. The project would not result in disproportionately high and adverse human health or environmental effects on minority and low-income populations.
<b>HUD ENVIRONMENTAL STANDARDS</b> Noise Abatement and Control [24 CFR 51B]	B	The proposed project would include the rehabilitation of existing affordable housing units. Proposed improvements would be in compliance with the sound insulation requirements of Title 24 of the California Uniform Building Code ensuring a healthy interior noise environment. The proposed residential use would be a continuation of the existing use and in conformance with City of Los Angeles zoning regulations. Acoustical Analysis Reports prepared for each of the subject properties by Veneklasen Associates, Inc. (VA) revealed that two of the subject properties, 1401 S. Arlington and 1020 Kingsley Drive, were exposed to exterior Day-Night Noise Levels (Ldn) greater than 65 decibels; 70.2 and 65.3, respectively. A DNL



		<p>between 65 decibel (dB) and 75 dB is “Normally Unacceptable” under HUD noise standards as per 24 CFR 51, and HUD actively seeks to have noise attenuation features incorporated into projects involving existing construction as part of the rehabilitation activities to be undertaken. As such, the following mitigation measures recommended by Veneklasen Associates have been incorporated into the proposed rehabilitation activities at each subject property. (See Appendix D)</p> <p style="text-align: center;"><b><u>Mitigation Measures</u></b></p> <ul style="list-style-type: none"> <li>• For each property: Windows on building facades shall have an sound transmission class (STC) rating of 23 or better</li> <li>• For 1745 W. 20<sup>th</sup> Street: Windows on the facades of units along Budlong Avenue shall have an STC rating of 24 or better</li> <li>• For 1401 S. Arlington Avenue: Windows on east facade shall have an STC rating of 24 or better</li> </ul>
<p>Explosive and Flammable Operations [24 CFR 51C]</p>	<p>A</p>	<p>According to the Phase I Environmental Site Assessments prepared by Barr &amp; Clark, Inc. in October 2009, for each of the project sites, none of the subject properties are listed on Federal American Society of Testing and Materials (ASTM) Standard, State ASTM Standard, Federal ASTM Supplemental, State or local ASTM Supplemental, and Brownfields databases. While there are numerous sites in the surrounding area listed on one of the above mentioned databases as containing hazardous materials, none contain explosive or flammable operations. The subject properties would continue to be used for multi-family residential housing and therefore would not involve any explosive or flammable operations. (See Appendix E)</p>
<p>Hazardous, Toxic or Radioactive Materials &amp; Substances [24 CFR 58.5(i)(2)]</p>	<p>B</p>	<p>Phase I Environmental Site Assessments (ESA) were prepared by Barr &amp; Clark, Inc. in October 2009 for each of the subject properties proposed for rehabilitation. As part of their assessment, Barr &amp; Clark, Inc. conducted a review of environmental environmental databases, including listings of known or suspected contaminated sites, known landfill locations, known leaking underground storage tanks (LUST), and operations regulated under federal or state hazardous waste regulations; as well as on-site reconnaissance and inspection. According</p>

		<p>to the Phase I ESA reports, Barr &amp; Clark did not identify any Recognized Environmental Conditions (RECs), as defined by ASTM Standard 1527-05, on any of the subject properties. However, Asbestos Containing Materials Reports and Lead-Based Paint Inspection Reports prepared by Barr &amp; Clark for each of the subject properties did find asbestos containing materials (ACM) to be present at each of the five project sites, and lead-based paint (LBP) was found to be present at three of the proposed sites; 1400 S. Kenmore Avenue, 1401 S. Arlington Avenue, and 1810 S. Magnolia Avenue (See Appendix F).</p> <p style="text-align: center;"><b><u>Mitigation Measures</u></b></p> <ul style="list-style-type: none"> <li>• Existing asbestos-containing materials (ACM) shall be properly removed and disposed of in accordance with all State and Federal policies and regulations by a licensed ACM professional.</li> <li>• Existing lead-based paint (LBP) found at 1400 S. Kenmore Avenue, 1401 S. Arlington Avenue, and 1810 S. Magnolia Avenue, shall be removed and disposed of in accordance with all State and Federal policies and regulations by a licensed LBP professional.</li> </ul>
<p>Airport Clear Zones and Accident Potential Zones [24 CFR 51D]</p>	<p>A</p>	<p>The project sites do not lie within the Runway Clear Zone or the Approach Safety Zone for the nearest airport - the Bob Hope Airport, located approximately 15 miles to the north in the City of Burbank.</p>

**DETERMINATION:**

- ( ) This project converts to EXEMPT, per Section 58.34(a)(12), because it does not require any mitigation for compliance with any listed statutes or authorities, nor requires any formal permit or license (Status "A" has been determined in the status column for all authorities); **Funds may be committed and drawn down** for this (now) EXEMPT project; OR
- ( x ) This project cannot convert to Exempt status because one or more statutes or authorities require formal consultation or mitigation. Complete consultation/mitigation protocol requirements, **publish NOI/RROF and obtain Authority to Use Grant Funds** (HUD 7015.16) per Section 58.70 and 58.71 before committing or drawing down funds; OR
- ( ) The unusual circumstances of this project may result in a significant environmental impact. This project requires preparation of an Environmental Assessment (EA). Prepare the EA according to 24 CFR Part 58 Subpart E.

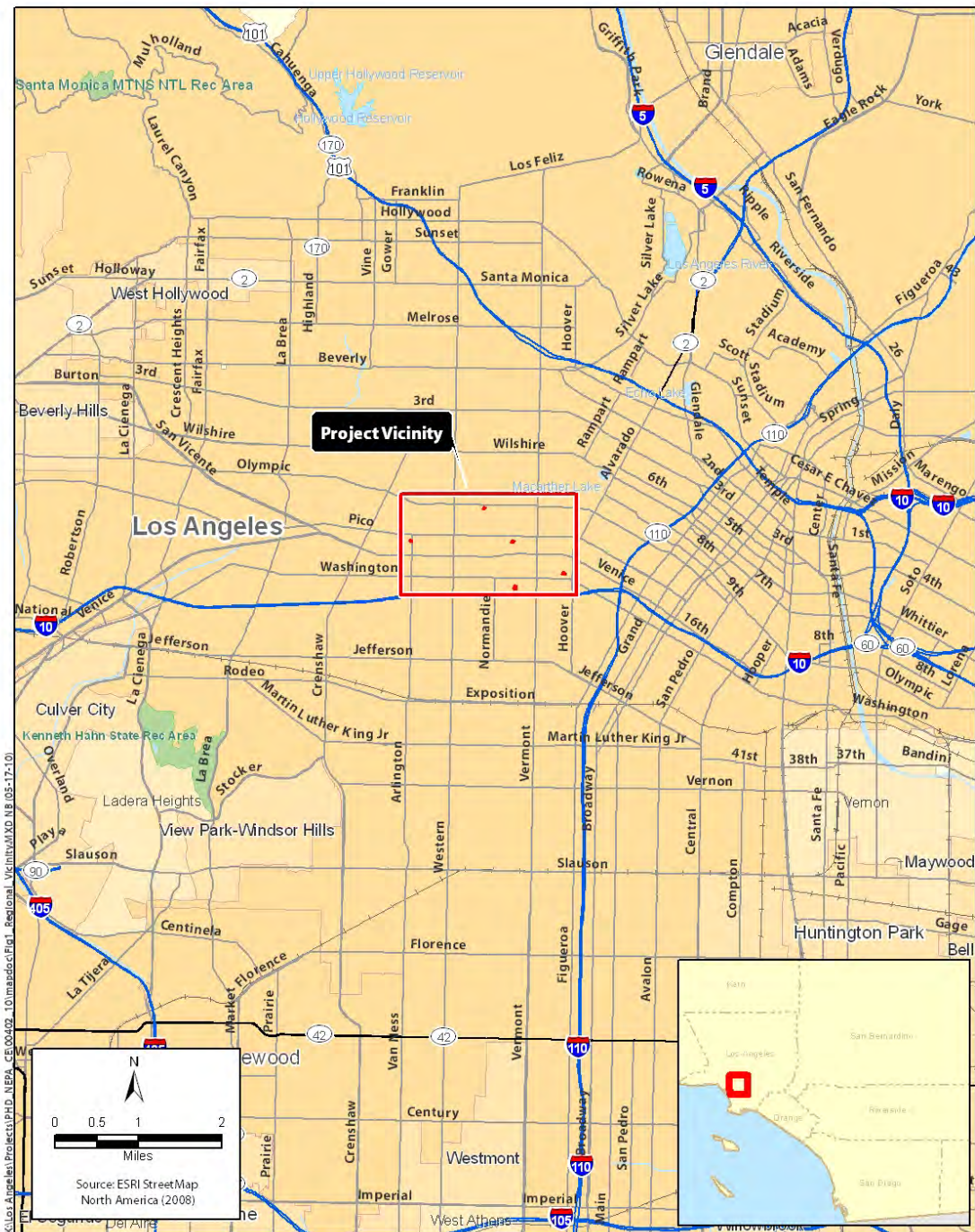


PREPARER SIGNATURE: \_\_\_\_\_ DATE: May 24, 2010

PREPARER NAME, COMPANY: Peter Feldman, ICF International, 811 West 7<sup>th</sup> Street, Los Angeles, CA 90017

RESPONSIBLE ENTITY AGENCY OFFICIAL / SIGNATURE: \_\_\_\_\_

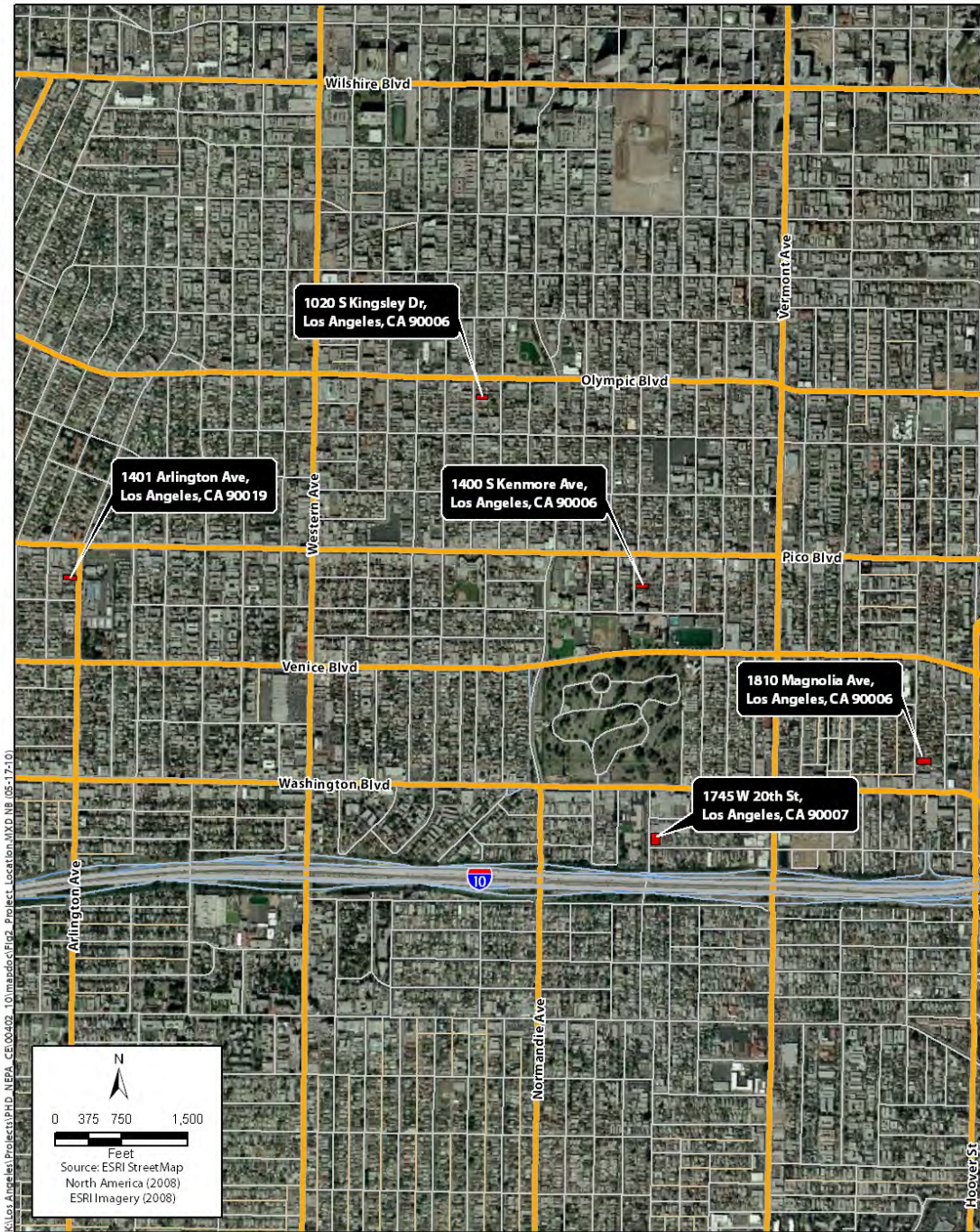
NAME, TITLE: \_\_\_\_\_ DATE: \_\_\_\_\_



**Figure 1**  
**Regional Vicinity Map**







**Figure 2**  
**Project Location Map**

**ENVIRONMENTAL ASSESSMENT FOR  
NEW GENESIS APARTMENTS PROJECT  
452-458 S. MAIN STREET  
LOS ANGELES, CALIFORNIA 90013**

**PREPARED FOR:  
SKID ROW HOUSING TRUST**

**PREPARED BY:  
ICF INTERNATIONAL**

**JANUARY 2010**



## ENVIRONMENTAL ASSESSMENT

**Responsible Entity:** California Tax Credit Allocation Committee (CTCAC)

[24 CFR 58.2(a)(7)]

**Certifying Officer:** William J. Pavão, Executive Director, California Tax Credit Allocation Committee (CTCAC) [24 CFR 58.2(a)(2)]

**Project Name:** New Genesis Apartments

**Estimated Total Project Cost:** \$34,928,465

**Grant Recipient:** New Genesis Apartments, L.P. [24 CFR 58.2(a)(5)]

**Recipient Address:** 1317 E. 7<sup>th</sup> Street, Los Angeles, CA 90013

**Project Representative:** Oliver Baker, Project Manager

**Telephone Number:** 213-683-0522

**Conditions for Approval:** *(List all mitigation measures adopted by the responsible entity to eliminate or minimize adverse environmental impacts. These conditions must be included in project contracts and other relevant documents as requirements).* [24 CFR 58.40(d), 40 CFR 1505.2(c)]

### I. Aesthetics (Greater Downtown Housing Incentive Area)

- Prior to issuance of a building permit, the Los Angeles Community Redevelopment Agency (CRA/LA) shall make a determination that the project complies with the Urban Design Standards and Guidelines.

### II. Aesthetics (Landscaping)

- All open areas not used for buildings, driveways, parking areas, recreation facilities or walks shall be attractively landscaped and maintained in accordance with a landscape plan, including an automatic irrigation plan, prepared by a licensed landscape architect.

### III. Aesthetics (Graffiti)

- Every building, structure, or portion thereof, shall be maintained in a safe and sanitary condition and good repair, and from graffiti, debris, rubbish, garbage, trash, overgrown vegetation or other similar material, pursuant to Municipal Code Section 91.8104.
- The exterior of all buildings and fences shall be kept free of graffiti.

### IV. Aesthetics (Light)

- Outdoor lighting shall be designed and installed with shielding, to direct light towards the ground.



## **V. Aesthetics (Glare)**

- The exterior of the proposed building shall be constructed of materials such as high-performance tinted non-reflective glass and pre-cast concrete or fabricated wall surfaces.

## **VI. Air Quality (Stationary)**

- An air filtration system shall be installed and maintained for both commercial and residential uses with filters meeting or exceeding the ASHRAE Standard 52.2 Minimum Efficiency Reporting Value (MERV) of 12, to the satisfaction of the Department of Building and Safety.

## **VII. Air Quality (Construction Period)**

- All unpaved demolition and construction areas shall be wetted at least twice daily during excavation and construction, and temporary dust covers shall be used to reduce dust emissions and meet SCAQMD District Rule 403. Wetting could reduce fugitive dust by as much as 50 percent.
- The owner or contractor shall keep the construction area sufficiently dampened to control dust caused by construction and hauling, and at all times provide reasonable control of dust caused by wind.
- All loads shall be secured by trimming, watering, or other appropriate means to prevent spillage and dust.
- All materials transported off site shall be either sufficiently watered or securely covered to prevent excessive amount of dust.
- All clearing, earth moving, or excavation activities shall be discontinued during periods of high wind (i.e., greater than 15 mph), so as to prevent excessive amounts of dust.
- General contractors shall maintain and operate construction equipment so as to minimize exhaust emissions.

## **VIII. Cultural Resources (Archaeological)**

- A professional archaeologist shall be retained to monitor any earth moving operations
- If cultural resources are encountered in the APE during construction, all work shall halt until the resources can be properly evaluated by a qualified professional archaeologist as outlined in Stipulation XII of the Programmatic Agreement of September 6, 1995 among the City of Los Angeles, the State Historic Preservation Officer, and the Advisory Council on Historic Preservation.
- Copies of the archaeological survey, study or report shall be submitted to the UCLA Archaeological Information Center.
- A covenant and agreement shall be recorded prior to obtaining a grading permit.

## **IX. Geology, Seismicity, and Soil**

- The design and construction of the project shall conform to the Uniform Building Code seismic standards as approved by the Department of Building and Safety.

## X. Noise (Noise Attenuation)

- Exterior walls shall be airtight. All joints shall be grouted or caulked airtight. At the penetration of exterior walls by pipes, ducts, or conduits, the space between the wall and pipes, ducts, or conduits shall be caulked or filled with mortar.
- Window assemblies shall have a sound transmission class (STC) rating of not less than 30.
- Insulation material shall be at least two inches thick and shall be installed continuously throughout the cavity space behind the exterior sheathing and between wall studs.
- The interior surface of the exterior walls shall be gypsum board or plaster at least ½ inch thick, installed on the studs. Continuous composition board, plywood, or gypsum board sheathing at least ½ inch thick shall cover the exterior side of the wall studs behind wood or metal siding. Asphaltic or wood shake shingles are acceptable in lieu of siding.
- The project sponsor shall comply with the Noise Insulation Standards of Title 24 of the California Code of Regulations, which insures an acceptable interior noise environment of 45 dB or lower.

## XI. Noise (Construction Period)

- The project shall comply with City of Los Angeles Noise Ordinance Nos. 144,331 and 161,574, and any subsequent ordinances, which prohibit the emission and creation of noise beyond certain levels at adjacent uses unless technically infeasible
- Construction and demolition shall be restricted to the hours of 7:00 a.m. to 6:00 p.m. Monday through Friday, and 8:00 a.m. to 6:00 p.m. on Saturday.
- Construction and demolition activities shall be scheduled so as to avoid operating several pieces of equipment simultaneously.
- The project contractor shall use power construction equipment with state-of-the-art noise shielding and muffling devices
- All mobile or fixed noise-producing equipment used on the project that is regulated for noise output by a local, state, or federal agency shall comply with such regulation while in the course of project activity.
- Electrically powered equipment instead of pneumatic or internal combustion powered equipment shall be used, where feasible.
- Material stockpiles and mobile equipment staging, parking, and maintenance areas shall be located as far as practicable from noise-sensitive receptors.
- Construction site and haul-road speed limits shall be established and enforced during the construction period.
- The hours of construction including noisy maintenance activities and all spoils and material transport shall be restricted to the periods and days permitted by the local noise or other applicable ordinance. The only exception to this mitigation should be inaudible underground tunneling or similar construction activity. Noise-producing project activity shall comply with local noise control regulations affecting construction activity or obtain exemptions therefrom.
- The use of noise-producing signals, including horns, whistles, alarms, and bells shall be for safety warning purposes only.

- No project-related public address or music system shall be audible at any adjacent receptor.
- The onsite construction supervisor shall have the responsibility and authority to receive and resolve noise complaints. A clear appeal process to the Owner shall be established prior to construction commencement that will allow for resolution of noise problems that cannot be immediately solved by the site supervisor.
- The contractor shall develop a project noise control plan, which shall have been approved and implemented prior to commencement of any construction activity.
- Noise control features and plans shall be reviewed and approved by a noise control engineering professional.
- Contract incentives may be offered to the construction contractor to minimize or eliminate noise complaints resulting from project activities where project construction would result in significant noise impacts.
- The emplacement of berms or erection of temporary soundwall barriers shall be considered where project activity is unavoidably close to noise-sensitive receptors.
- Planting of trees and shrubbery while useful for visual screening is not an effective noise control mechanism and is not considered a noise control or mitigation measure for noise impacts.

## **XII. Noise (Rooftop Mechanical Equipment)**

- The applicant shall incorporate noise attenuating methods and devices to limit increased noise resulting from rooftop mechanical equipment, to no greater than a 3 decibel (dB) CNEL increase as measured at the property line.

## **XIII. Erosion and Grading**

- Excavation and grading activities shall be scheduled during dry weather periods. If grading occurs during the rainy season (October 15 through April 1), diversion dikes shall be constructed to channel runoff around the site. Channels shall be lined with grass or roughened pavement to reduce velocity.
- Appropriate erosion control and drainage devices shall be provided to the satisfaction of the Building and Safety Department. These measures include interceptor terraces, berms, vee-channels, and inlet and outlet structures, as specified by Section 91.7013 of the Building Code, including planting fast-growing annual and perennial grasses in areas where construction is not immediately planned.
- Stockpiles and excavated soil shall be covered with secured tarps or plastic sheeting.

## **XIV. Hazardous Materials or Waste (Construction Period)**

- All waste shall be disposed of properly. Appropriately labeled recycling bins to recycle construction materials including: solvents, water-based paints, vehicle fluids, broken asphalt and concrete; wood, and vegetation shall be used. Non recyclable materials/wastes shall be taken to an appropriate landfill. Toxic wastes shall be discarded at a licensed regulated disposal site.
- Leaks, drips and spills shall be cleaned up immediately to prevent contaminated soil on paved surfaces that can be washed into storm drains.

- Pavement shall not be hosed down at material spills. Dry cleanup methods shall be used whenever possible.
- Dumpsters shall be covered and maintained. Uncovered dumpsters shall be placed under a roof or cover with tarps or plastic sheeting.
- Where truck traffic is frequent, gravel approaches shall be used to reduce soil compaction and limit the tracking of sediment into local streets and roadways.
- All vehicle/equipment maintenance, repair, and washing shall be conducted away from storm drains. All major repairs shall be conducted off-site. Drip pans or drop clothes shall be used to catch drips and spills.

#### **XV. Hazardous Materials or Waste (Lead-Based Paint)**

- All removal of lead-based paint and/or lead hazards be completed in accordance with the following regulations:
  - Title 17, California Code of Regulations, Division 1, Chapter 8: Accreditation, Certification and Work Practices for Lead-Based Paint and Lead Hazards.
  - Title 8, California Code of Regulations, Section 1532.1: Cal/OSHA Construction Safety Orders, Lead.
  - “Guidelines for the Evaluation and Control of Lead-Based Paint Hazards in Housing,” US Department of Housing and Urban Development, June 1995.
- All waste generated from any lead related work must be properly profiled and disposed of. Waste manifests documenting the disposal site shall be submitted at the end of each phase of the job.
- All future renovation, demolition, construction or abatement activities with the potential for disturbing identified ACM or LBP, be performed by properly trained and qualified personnel. Certain interim measures shall be considered in cases where abatement is not immediately feasible or possible. These measures shall be addressed through the initiation of a formal Operations and Maintenance Program.

#### **XVI. Pedestrian and Vehicular Safety**

- The developer shall install appropriate traffic signs around the site to ensure pedestrian and vehicle safety.
- Fences shall be constructed around the site to minimize trespassing, vandalism, short-cut attractions and attractive nuisances.
- The applicant shall submit a parking and driveway plan that incorporates design features that reduce accidents, to the Bureau of Engineering and the Department of Transportation for approval.

#### **XVII. Greenhouse Gas Emissions**

- Construction of the building shall exceed Title 24 minimum requirements for insulation of walls, ceilings, and fenestration, to the satisfaction of the Department of Building and Safety.



- Only low-and non-volatile organic compound (VOC) containing paints, sealants, and adhesives shall be utilized in the construction and maintenance of the building.

## **XVIII. Fire Services**

The following recommendations of the Fire Department relative to fire safety shall be incorporated into the building plans:

- A plot plan shall be submitted for approval by the Fire Department either prior to the recordation of a final map or the approval of a building permit.
- The plot plan shall include the following minimum design features:
  - fire lanes, where required, shall be a minimum of 20 feet in width;
  - all structures must be within 300 feet of an approved fire hydrant; and
  - entrances to any dwelling unit or guest room shall not be more than 150 feet in distance in horizontal travel from the edge of the roadway of an improved street or approved fire lane.

## **XIX. Police Services**

- The plans shall incorporate the design guidelines relative to security, semi-public and private spaces, which may include but is not limited to access control to building, secured parking facilities, walls/fences with key systems, well-illuminated public and semi-public space designed with a minimum of dead space to eliminate areas of concealment, location of toilet facilities or building entrances in high-foot traffic areas, and provision of security guard patrol throughout the project site if needed and other measures as outlined in *Design Out Crime Guidelines: Crime Prevention Through Environmental Design* published by the Los Angeles Police Department's Crime Prevention Section. These measures shall be approved by the Police Department prior to the issuance of building permits.

## **XX. School Services**

- The applicant shall pay school fees to the Los Angeles Unified School District to offset the impact of additional student enrollment at schools serving the project area.

## **XXI. Recreation**

- Per Section 17.12-A of the LA Municipal Code, the owner/developer shall pay the applicable Quimby fees for the construction of condominiums, or Recreation and Park fees for construction of apartment buildings.

## **XXII. Street Improvements**

- The project shall comply with the Bureau of Engineering's requirements for street dedications and improvements that will reduce traffic impacts in direct proportion to those caused by the proposed project.

## **XXIII. Stormwater Runoff Management / Surface Water**

Ordinance Nos. 172,176 and 173,494 specify Stormwater and Urban Runoff Pollution Control, which requires the application of Best Management Practices (BMPs). Chapter IX, Division 70 of the Los Angeles Municipal Code addresses grading, excavations, and fills. Applicants shall meet the requirements of the Standard Urban Stormwater Mitigation Plan (SUSMP) approved by Los Angeles Regional Water Quality Control Board, including the following (a copy of the SUSMP can be downloaded at <http://www.swrcb.ca.gov/rwqcb4/>):

- Project applicant shall implement stormwater BMPs to treat and infiltrate the runoff from a storm event producing  $\frac{3}{4}$  inch of rainfall in a 24-hour period. The design of structural BMPs shall be in accordance with the *Development Best Management Practices Handbook*, Part B Planning Activities. A signed certificate from a California licensed civil engineer or licensed architect that the proposed BMPs meet this numerical threshold standard is required.
- Post development peak stormwater runoff discharge rates shall not exceed the estimated pre-development rate for developments where the increased peak stormwater discharge rate will result in increased potential for downstream erosion.
- Trees and other vegetation shall be maximized at each site by planting additional vegetation, clustering tree areas, and promoting the use of native and/or drought tolerant plants.
- Any connection to the sanitary sewer shall have authorization from the Bureau of Sanitation.
- Impervious surface area shall be reduced by using permeable pavement materials where appropriate, including: pervious concrete/asphalt; unit pavers, i.e., turf block; and granular materials, i.e., crushed aggregates, cobbles.
- Roof runoff systems shall be installed where site is suitable for installation. Runoff from rooftops is relatively clean, can provide groundwater recharge, and reduce excess runoff into storm drains.
- Messages shall be painted adjacent to storm drain inlets that prohibit the dumping of improper materials into the storm drain system. Prefabricated stencils can be obtained from the Department of Public Works, Stormwater Management Division.
- All storm drain inlets and catch basins within the project area shall be stenciled with prohibitive language (such as NO DUMPING—DRAINS TO OCEAN) and/or graphical icons to discourage illegal dumping.
- Signs and prohibitive language and/or graphical icons, which prohibit illegal dumping, shall be posted at public access points along channels and creeks within the project area.
- Legibility of stencils and signs shall be maintained.
- Materials with the potential to contaminate stormwater must be: (a) placed in an enclosure such as, but not limited to, a cabinet, shed, or similar stormwater conveyance system: or (b) protected by secondary containment structures such as berms, dikes, or curbs. The storage area must be paved and sufficiently impervious and must be sheltered by a roof or awning to minimize collection of stormwater within the secondary containment area.
- An efficient irrigation system shall be designed to minimize runoff including: drip irrigation for shrubs to limit excessive spray, shutoff devices to prevent irrigation after significant precipitation, and flow reducers.
- The owner(s) of the property shall prepare and execute a covenant and agreement (Planning Department General form CP-6770) satisfactory to the Planning Department binding the owners

to post-construction maintenance on the structural BMPs in accordance with the Standard Urban Stormwater Mitigation Plan and/or per manufacturer's instructions.

#### **XXIV. Utilities (Local or Regional Water Supplies)**

- The project shall comply with Ordinance No. 170,978 (Water Management), which imposes water conservation measures in landscape, installation, and maintenance (e.g., use drip irrigation and soak hoses in lieu of sprinklers to lower the amount of water lost to evaporation and overspray, set automatic sprinkler systems to irrigate during the early morning or evening hours to minimize water loss due to evaporation, and water less in the cooler months and during the rainy season).
- **All New Construction, Commercial/Industrial Remodel, Condominium Conversions, and Adaptive Reuse**

Unless otherwise required, and to the satisfaction of the Department of Building and Safety, the applicant shall install:

- a. High-efficiency toilets (maximum 1.28 gpf), including dual-flush water closets, and high-efficiency urinals (maximum 0.5 gpf), including no-flush or waterless urinals, in all restrooms as appropriate. Rebates may be offered through the Los Angeles Department of Water and Power to offset portions of the costs of these installations.

- b. Restroom faucets with a maximum flow rate of 1.5 gallons per minute.

Single-pass cooling equipment shall be strictly prohibited from use. Prohibition of such equipment shall be indicated on the building plans and incorporated into tenant lease agreements. (Single-pass cooling refers to the use of potable water to extract heat from process equipment—e.g., vacuum pump, ice machines—by passing the water through equipment and discharging the heated water to the sanitary wastewater system.)

- **All New Commercial and Industrial**

Unless otherwise required, all restroom faucets shall be of a self-closing design, to the satisfaction of the Department of Building and Safety.

- **All New Residential, Condominium Conversions, and Adaptive Reuse**

Unless otherwise required, and to the satisfaction of the Department of Building and Safety, the applicant shall:

- a. Install a demand (tankless or instantaneous) water heater system sufficient to serve the anticipated needs of the dwellings.
- b. Install no more than one showerhead per shower stall, having a flow rate no greater than 2.0 gallons per minute.
- c. Install and utilize only high-efficiency clothes washers (water factor of 6.0 or less) in the project, if proposed to be provided in either individual units and/or in a common laundry room(s). If such appliance is to be furnished by a tenant, this requirement shall be incorporated into the lease agreement, and the applicant shall be responsible for ensuring compliance. Rebates may be offered through the Los Angeles Department of Water and Power to offset portions of the costs associated with installation.
- d. Install and utilize only high-efficiency Energy Star-rated dishwashers in the project, if proposed to be provided. If such appliance is to be furnished by a tenant, this requirement

shall be incorporated in the lease agreement, and the applicant shall be responsible for ensuring compliance.

- **Landscaping**

In addition to the requirements of the Landscape Ordinance, the landscape plan shall incorporate the following:

- a. Weather-based irrigation controller with rain shutoff
- b. Matched precipitation (flow) rates for sprinkler heads
- c. Drip/microspray/subsurface irrigation where appropriate
- d. Minimum irrigation system distribution uniformity of 75 percent
- e. Proper hydro-zoning, turf minimization and use of native/drought tolerant plant materials
- f. Use of landscape contouring to minimize precipitation runoff
- g. A separate water meter (or submeter), flow sensor, and master valve shutoff shall be installed for irrigated landscape areas totaling 5,000 sf. and greater, to the satisfaction of the Department of Building and Safety

## **XXV. Utilities (Solid Waste)**

- Recycling bins shall be provided at appropriate locations to promote recycling of paper, metal, glass, and other recyclable material. These bins shall be emptied and recycled accordingly as a part of the project's regular solid waste disposal program.
- Prior to the issuance of any demolition or construction permit, the applicant shall provide a copy of the receipt or contract from a waste disposal company providing services to the project, specifying recycled waste service(s), to the satisfaction of the Department of Building and Safety. The demolition and construction contractor(s) shall only contract for waste disposal services with a company that recycles demolition and/or construction-related wastes.
- To facilitate onsite separation and recycling of demolition and construction-related wastes, the contractor(s) shall provide temporary waste separation bins onsite during demolition and construction. These bins shall be emptied and recycled accordingly as part of the project's regular solid waste disposal program.



**Finding:** [58.40(g)]

**Finding of No Significant Impact**

(The project will not result in a significant impact on the quality of the human environment)

**Finding of Significant Impact**

(The project may significantly affect the quality of the human environment)

Shilpa Trisal

**Preparer Signature:** \_\_\_\_\_ **Date:** January 7, 2010

**Name/Title/Agency:** Shilpa Trisal, AICP/Senior Environmental Planner/ICF Jones & Stokes

**RE Approving Official Signature:** \_\_\_\_\_ **Date:** \_\_\_\_\_

**Name/Title/ Agency:** William J. Pavão/Executive Director/California Tax Credit Allocation Committee

**STATEMENT OF PURPOSE AND NEED***[40 CFR 1508.9(b)]*

The proposed development is located along the boundary of two developing districts of the City of Los Angeles, the Old Bank District and Skid Row also known as Central City East. Prior to World War II, the Old Bank District along with the “Historic Core”, was the City’s center until financial and commercial development began to move several blocks west into what is today referred to as the Financial Core. Similarly, the Skid Row neighborhood developed out of the booming railroad industries which developed in Los Angeles between 1880 and 1930. The neighborhood was historically an area which provided affordable housing such as single resident occupancy (SRO) hotels to short-term railroad workers and other low-income residents in the City of Los Angeles. However, between 1940 and 1970, changing development patterns resulted in a systematic removal of affordable and low-income housing options for the working poor, unemployed, disabled and otherwise marginalized residents of the City of Los Angeles, and in particular, residents of Skid Row. As a result, the Skid Row neighborhood lost approximately 50% of its housing stock between 1960 and 1970 resulting in the displacement of numerous very low-income, disabled, substance dependent and/or mentally-ill persons.

Today, Skid Row has one of the largest stable homeless populations in the country. As such, factors of overcrowding, unsafe living conditions, a growing homeless population, high poverty rate, limited private investment, and recent increased interest in redeveloping the area has led to a demand for quality affordable housing. In 1975 the Los Angeles City Council adopted the Central Business District Redevelopment Project which among other endeavors, sought to preserve the existing housing stock in Downtown Los Angeles by acquiring, converting, and rehabilitating existing SRO hotels to provide affordable housing in the heart of Downtown. In particular, according to the Central City Community Plan, the Historic Core and Central City East (Skid Row) have been targeted for redevelopment and reuse of underused or abandoned buildings into residential and mixed-use developments in an effort to foster a the development of a residential neighborhood. In particular, Central City East has been targeted as a priority intervention area for the rehabilitation of the area's SRO hotels using mechanisms such as the Greater Downtown Housing Incentive ordinance which provides economic incentives for developments providing affordable housing.

The 2000 Census figures show that the area surrounding the project site (Census Tract 2073, Los Angeles County) contains a large minority population of approximately 64 % (non-white population). The area is further characterized with very low income levels and high unemployment for its residents, with 47.7 % of the population living below the federal poverty level, and a per capita income of \$16,266 per year. The low-income characteristics of the neighborhood residents have led to several social service providers locating within the area, and for the need for additional affordable housing options. Based upon the characteristics of neighborhood residents, local interest in redevelopment, and the need to preserve and expand the number of affordable housing units for very low-income, unemployed, disabled and formerly homeless residents in the area, the proposed development would provide an expanded SRO-style apartment complex in place of the existing Genesis Hotel to provide a greater number of affordable quality housing for Skid Row residents. The development would provide 106 very low- to low-income housing units as well as on-site supportive services such as case management, addiction attenuation classes, and support groups.

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## DESCRIPTION OF THE PROPOSAL

*Include all contemplated actions that are either geographically or functionally a composite part of the project, regardless of the source of funding. [24 CFR 58.32, 40 CFR 1508.25]*

The project site is located in downtown Los Angeles, at 452-458 S. Main Street, approximately 0.75 mile east of I-110 and 0.75 mile south of I-101 (Figure 1). The site is comprised of two adjacent parcels (APN #'s 51480010 and 51480011) bounded on the west by Main Street, on the east by Werdin Place and on the north and south by existing buildings; the former Regent Theater and the Café Bermuda, respectively (Figure 2). The gross project site area is approximately 0.4 acre.

The project proposes construction of a six-story mixed-use building over a concrete podium with one level of subterranean parking. The new building would contain 106 residential units (including 2 manager's units), supportive service offices, commercial space, and community space. The ground floor of the proposed building would house a main lobby, approximately 2,400 square feet of commercial space, administrative support spaces, social service offices, a community room, and an enclosed open-sky courtyard shielded from Main Street by the building façade. Above the first floor, low-income residential units would be arranged around the open air courtyard providing natural ventilation and light. The subterranean parking lot would contain 29 parking spaces for staff, patrons of the commercial space, and one spot for each of the building's units restricted above 50% area median income (AMI) as per local zoning code requirements (Figure 3).

Pedestrian access to the building would be provided via Main Street and would involve a security card/intercom-operated lobby entrance and a key-card operated security gate providing access to the central courtyard and residential units. Vehicular access to the subterranean parking level would be provided via Werdin Place where a private Americans with Disabilities Act (ADA) compliant elevator and stairwell shall provide access to the main lobby, courtyard and upper floors. Each of the 106 residential units would provide a full private bathroom and a kitchenette containing a sink, refrigerator, a stove or microwave, cabinets, and counter space. Each unit would be furnished with a bed, nightstand, wardrobe/dresser, chairs and window treatments and would include wiring for cable/dish television, high speed internet access, and telephones. Eight of the 106 residential units would be designed as one-bedroom loft style units with an area of approximately 600 square feet. Six of these units would house very low- and low-income tenants, while two others would be one-bedroom loft style units for the assistant manager and manager. The remaining 98 residential units would be constructed as efficiency units consisting of a single room and bathroom designed for single tenants and would generally measure between 300 and 400 square feet. Several units would be designed to accommodate those who are physically disabled while all other units would be ADA convertible. Community amenities include a community kitchen and attached community room, a landscaped courtyard with outdoor communal space, a full laundry room on the ground floor, and upper-level walkways providing patio space.

At the ground floor level, there would be approximately 2,400 square feet of commercial retail space that would be accessible from Main Street or via the subterranean parking facility. Parking for patrons of the commercial retail businesses would be provided through the shared subterranean parking lot which would contain approximately 3 to 6 designated commercial parking spaces.

The site is currently occupied by an existing two-story building, the Genesis Hotel, and an adjacent 32 space surface parking lot. Both the Genesis Hotel and the surface parking lot are currently owned by the project proponent, New Genesis Apartments, L.P. The County of Los Angeles has a lease for 16 of the 32 parking spaces on the lot which shall expire at the end of 2009; the remaining 16 spaces are currently used by New Genesis Apartments, L.P. employees. Following approval of the proposed project, the existing Genesis Hotel and parking lot would be demolished. Tenants of the existing Genesis Hotel have already been vacated and relocated to other similar housing accommodations. Design, construction, and operation of the proposed project would seek the U.S. Green Building Council's (USGBC) Leadership in Energy and Environmental Design (LEED) silver rating through adherence to various USGBC standards pertaining to materials containing volatile organic compounds, erosion control, stormwater issues, light pollution, water efficiency, energy performance, green energy, and renewable building materials, among others.

Construction of the proposed project is expected to begin February 2010 and would last approximately 18 months. The phases of the project construction include demolition, shoring and excavation, and structure construction. Construction is expected to be complete by August 2011.

An Initial Study/Mitigated Negative Declaration (IS/MND) was prepared for the proposed project by the City of Los Angeles, dated July 23, 2008 (Appendix A). The mitigation measures described in the IS/MND have been incorporated into the "Conditions of Approval" in the previous section.



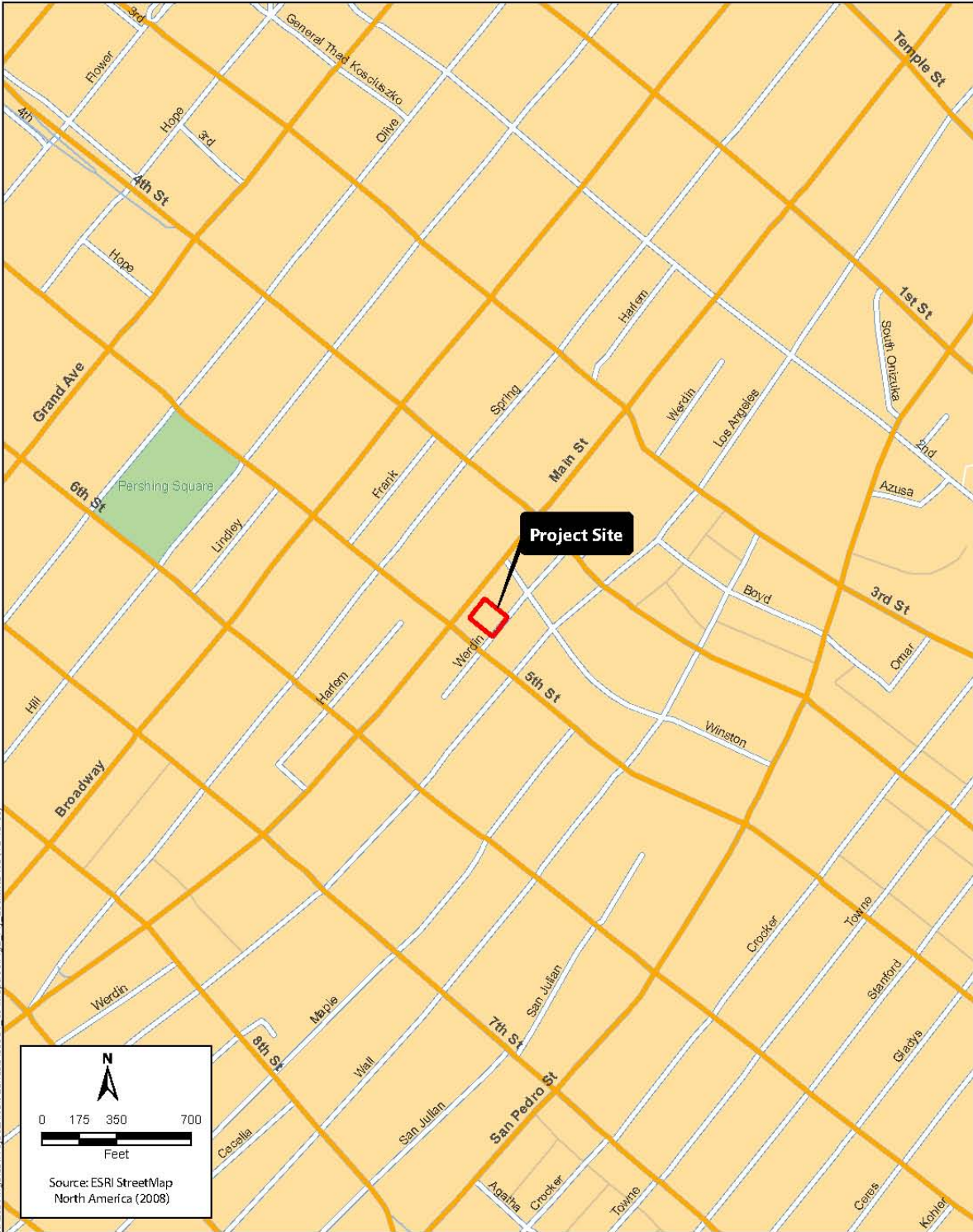


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North arrow and scale bar (0 to 2 miles). Source: ESRI StreetMap North America (2008).



**Figure 1**  
**Regional Vicinity Map**  
**New Genesis Apartments Project**



**Figure 2**  
**Project Location Map**  
**New Genesis Apartments Project**





Figure 3  
Rendering of the Proposed Project  
New Genesis Apartments Project

*Source: Killefer Flammang Architects; New Genesis Apartments, 452 S. Main Street, Skid Row Housing Trust*

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## EXISTING CONDITIONS AND TRENDS

*Describe the existing conditions of the project area and its surroundings, and trends likely to continue in the absence of the project. [24 CFR 58.40(a)]*

The 0.4 acre project site currently consists of an existing two-story single resident occupancy hotel, the Genesis Hotel (see Photo 1), and a surface parking lot containing approximately 32 parking spaces (see Photo 2). Both properties are currently owned by the project proponent. The Genesis Hotel building, occupying addresses 452, 456, and 456 ½ on the east side of South Main Street, has been vacated of its commercial and residential tenants and is currently closed in preparation for the proposed project. The 32 space parking facility, marked 458 S. Main Street, is a gated parking lot currently used by New Genesis Apartments, L.P. employees and partially leased to the County of Los Angeles until the end of 2009. The existing two-story Genesis Hotel building is a rectangular wood frame structure with masonry and stucco exterior constructed during the early 1930's. The first floor contains two commercial storefront spaces fronting Main Street while the second floor consists of the Genesis Hotel containing 29 single resident occupancy (SRO) units and various communal amenities such as bathrooms and a kitchen area (see Photos 8-10).

The City of Los Angeles General Land Use Map for the Central City Community Plan Area (as of July 7, 2009) designates the project site for Community Commercial land use. According to the City of Los Angeles Zoning Information and Map Access System (ZIMAS), the project site is zoned a "C4-2D" commercial zone which allows for multiple dwelling residential projects that include limited ground floor commercial uses. The height restriction for the C4-2D zoning designation is 150 feet. According to the Central City Community Plan, the project site is located along the border of two distinct districts within the Central City Community Plan area, the Old Bank/Historic Core District and the Central City East District, also known as Skid Row. Surrounding properties are primarily mixed-use buildings with a general trend of commercial uses occupying the ground floor and residential uses occupying upper floors. The properties surrounding the project site include: the Café Bermuda (see Photo 6), a restaurant and eatery to the south; the former Regent Theater (see Photo 5) which is currently used by Little Radio an online radio station and record store to the north; the King Edward Hotel (see Photo 2), an historic building which serves as a hotel, and contains first floor retail businesses to east; and directly across Main Street to west, the New Million Dollar Roslyn Hotel (see Photo 4), a mixed-use SRO building with commercial and art gallery space located on the first and second floors. Other land uses in the vicinity follow a similar pattern of multi-story mixed-use buildings generally involving commercial retail uses on the ground floor and office or residential uses on upper floors. Several fee-based parking facilities are also located along surrounding streets including a surface parking facility (see Photo 7) and a multi-level parking structure, the "Main Street Parking Structure," (see Photo 8) along the west side of Main Street, oriented directly north of the project site. The project site is located in the Community Development Agency's Central Business District Redevelopment Project Area, the City of Los Angeles Downtown Adaptive Reuse Incentive Area and the City of Los Angeles City Center Redevelopment Project Area.





Photo 1: Existing Genesis Hotel building – View southeast from west side of Main Street

Source: ICF Jones & Stokes, December 2009.



Photo 2: Existing surface parking lot with King Edward Hotel visible in the background – View southeast from west side of Main Street.

Source: ICF Jones & Stokes, December 2009





Photo 3: Back of existing Genesis Hotel building – View from Werdin Place  
Source: ICF Jones & Stokes, December 2009





Photo 4: Existing surface parking lot with New Million Dollar Rosyln Hotel building visible in the background – View from Werdin Place.  
*Source: ICF Jones & Stokes, December 2009*



Photo 5: Adjacent property, former Regent Theater, at 450 S. Main Street—View northeast from west side of Main Street.

Source: ICF Jones & Stokes, December 2009





Photo 6: Adjacent property, Café Bermuda, at 464 S. Main Street- View southeast from west side of Main Street.

Source: ICF Jones & Stokes, December 2009



Photo 7: Adjacent property, surface parking lot, opposite project site – View northwest from east side of Main Street.

*Source: Pacific Environmental, Phase I Environmental Site Assessment, October 2007*



Photo 8: Adjacent property, six story parking garage, opposite project site – View northwest from east side of Main Street.

*Source: Pacific Environmental, Phase I Environmental Site Assessment, October 2007*



Photo 9: Existing Genesis Hotel interior, residential hallway, second floor.  
*Source: Pacific Environmental, Phase I Environmental Site Assessment, October 2007*



Photo 8: Existing Genesis Hotel interior, residential kitchenette and community space, second floor.  
*Source: Pacific Environmental, Phase I Environmental Site Assessment, October 2007*



Photo 9: Existing Genesis Hotel interior, vacant commercial space, first floor.

*Source: Pacific Environmental, Phase I Environmental Site Assessment, October 2007*



Photo 10: Existing Genesis Hotel interior, vacant commercial space, first floor.

*Source: Pacific Environmental, Phase I Environmental Site Assessment, October 2007*



There are no public parks or open space facilities located within the immediate vicinity of the project site. The nearest public park is Pershing Square, located approximately 0.25 mile northwest of the project site at the intersection of 5<sup>th</sup> Street and Hill Street. The park is a mostly paved open space area housing a fountain, landscaped terraces, and the Pershing Square Metro Station.

There are no schools in the immediate vicinity of the project site. The nearest educational facility to the project site is the Los Angelitos Early Education Center which is located approximately 0.6 mile southwest of the project site at Ninth Street and Olive Street. Other education facilities within 1.0 mile of the project site include 9<sup>th</sup> Street Elementary, MacArthur Park Primary Center, Esperanza Elementary School, Charles White Elementary School, Camino Nuevo Charter Academy, John H. Liechty Middle School, Los Angeles Academy of Arts and Enterprise, McAlister High School, Belmont Senior High School, and Design High School. There are also a number of vocational schools located in the vicinity of the project site. The project area is served by the Los Angeles Police Department, Central Community Police Station at 251 E. 6<sup>th</sup> Street. The Los Angeles Fire Department, Station No. 9 located at 430 E. 7<sup>th</sup> Street is the primary fire service provider to the project site.

Interstate 110 and U.S. 101 are the closest highways or freeways to the site and are both located approximately 0.75 miles to the northwest, and north, respectively. The Westlake community is well served by public transit services provided by Metro and the City of Los Angeles Department of Transportation (LADOT). Several Metro and LADOT bus routes have stops immediate to the project site. These routes include Metro lines 18, 33, 53/55, 62, 83, 92, 333, 355, 460 and Metro Rapid 720/728 and 753. The LADOT DASH Route D, Union Station bus operates along Main Street. The project is also located approximately 0.25 miles east of Metro's Pershing Square Subway Station which provides service on Metro's Red and Purple lines. Los Angeles International Airport (LAX) is the closest airport to the project site, located approximately 10.5 miles southwest of the project site. The project is not within the Runway Clear Zone (RCZ) for LAX.

The project site is within the Central City Community Plan area, which comprises approximately 2,161 acres of the Downtown Los Angeles area and is framed, roughly, by Interstate 110 to the west, U.S. 101 to the north, Alameda Street to the east, and Interstate 10 to the South. Based on the current Community Plan and the Citywide General Plan Framework, the population of the Central City Community Plan area is projected to reach 27,029 in 2010, with an estimated growth rate of 6.7% over the last decade. Average household income in the Community Plan area has traditionally been substantially lower than the rest of the City (in 1999 the average household income for the Central City Community Plan area was 25% lower than the citywide average). The proposed project would add new affordable housing units and stimulate economic commercial activity at the project site.

The Community Plan area will likely continue to grow in the absence of the project, both the Historic Core district and the Skid Row area where the proposed project is located, have been targeted for redevelopment of vacant and underused commercial and SRO hotel buildings. However, without the project, the project site's neighborhood would not benefit from the additional 106 affordable housing units resulting from the project. In the absence of the project, the project site would continue to be used as a parking lot and the existing Genesis Hotel would remain vacant.

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## STATUTORY CHECKLIST

*[24CFR §58.5] Record the determinations made regarding each listed statute, executive order or regulation. Provide appropriate source documentation. [Note reviews or consultations completed as well as any applicable permits or approvals obtained or required. Note dates of contact or page references.] Provide compliance or consistency documentation. Attach additional material as appropriate. Note conditions, attenuation or mitigation measures required.*

<b>Factors</b>	<b>Determination and Compliance Documentation</b>
<p><b>Historic Preservation</b> [36 CFR 800]</p>	<p>Compliance steps are not invoked. ICF Jones &amp; Stokes conducted a review of the proposed project under Section 106 of the National Historic Preservation Act (Appendix B). The review found 16 properties in the Area of Potential Effects (APE) that are at least 50 years of age or older. Four of these properties, including the subject property, were previously evaluated for listing in the National Register of Historic Places and are listed in the California State Historic Resources Inventory. With exception to the subject property, each of these properties appears eligible for listing in the National Register; the subject property was determined ineligible with an evaluation of 6Y (Determined ineligible for the National Register by consensus through Section 106 process- Not evaluated for the California Register or Local Listing). In addition, the Section 106 Review completed by ICF Jones &amp; Stokes concluded that 6 other properties in the APE are eligible for listing in the National Register individually, or as potential contributors to a National Register eligible historic district. However, in their review of the subject property APE conducted in December 2007, ICF Jones &amp; Stokes concluded that the proposed project would have no adverse effect on the identified historic properties in the APE. See Appendix B, Section 106 Review for further discussion of historic resources.</p> <p>Because ground disturbance would occur as part of the proposed project, a Cultural Resources Records Search Quick Check was conducted by the South Central Coastal Information Center of the California Historical Resources File System at California State University, Fullerton. The Quick Check revealed that no archeological surveys were on file resulting in the following recommendations made by the 2007 Section 106 Review prepared by ICF Jones &amp; Stokes:</p> <p style="text-align: center;"><b>Mitigation Measures</b></p> <ul style="list-style-type: none"> <li>• A professional archaeologist shall be retained to monitor any earth moving operations</li> <li>• If cultural resources are encountered in the APE during construction, all work must halt until the resources can be properly evaluated by a qualified professional archaeologist as outlined in Stipulation XII of the Programmatic Agreement of September 6, 1995 among the City of Los Angeles, the State Historic Preservation Officer, and the Advisory Council on Historic Preservation.</li> </ul>

Factors	Determination and Compliance Documentation
<p><b>Floodplain Management</b> [24 CFR 55, Executive Order 11988]</p>	<p>Compliance steps are not invoked. The project site is not located within a 100-year or 500-year floodplain according to the Safety Element of the City of Los Angeles General Plan, Exhibit F. The project site is located in Flood Zone X as identified on the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM) Number 06037C1636F, effective September 26, 2008 (Appendix C). Zone X refers to areas outside of the 0.2% annual chance floodplain and describes areas with a minimal risk of flood. The nearest flood zone is located approximately 1.0 mile east of the project site at the banks of the Los Angeles River, which is identified as a Flood Zone A. Zone A refers to areas subject to inundation by a 1% annual chance of flood. However, the Los Angeles River would not pose a risk of flooding to the project site due to its distant downslope location.</p>
<p><b>Wetlands Protection</b> [Executive Order 11990]</p>	<p>Compliance steps are not invoked. The project site is located in a highly urbanized portion of the City of Los Angeles where there are no wetlands, or other bodies of water within 0.5 mile of the project site. The nearest body of water is the Los Angeles River located approximately 1.0 mile from the project site. According to the U.S. Fish and Wildlife Service <i>Wetlands Online Mapper</i>, the portion of the Los Angeles River closest to the project site is designated as R2UBHx and R2USFr. The R2 designation describes lower perennial riverine water bodies while the UB and US classifications describe unconsolidated bottoms and unconsolidated shores, respectively. The Hx modifier describes a permanently flooded and excavated water body while the Fr modifier describes semi-permanently flooded and artificial water bodies. Both designations of the Los Angeles River describe water bodies that are unlikely to support wetland habitats, wildlife or sensitive vegetation due to the unconsolidated bottoms or shores and the man-made channels which characterize this portion of the Los Angeles River. Furthermore, construction activities would not affect the Los Angeles River as the construction limits are approximately 1.0 mile from the river and buffered by intervening urban developments. These findings are based on a search conducted December 17, 2009, using the <i>Wetlands Online Mapper</i> of the U.S. Fish and Wildlife Service (<a href="http://wetlandsfws.er.usgs.gov/imf/imf.jsp?site=NWI_CONUS">http://wetlandsfws.er.usgs.gov/imf/imf.jsp?site=NWI_CONUS</a>).</p>



Factors	Determination and Compliance Documentation
<p><b>Coastal Zone Management Act</b> [Sections 307(c), (d)]</p>	<p>Compliance steps are not invoked. The project site is not located within a coastal zone, as identified on the City of Los Angeles Coastal Zone Map, effective October 2003. (<a href="http://cityplanning.lacity.org/Code_Studies/Housing/CWCZ85x11102003.pdf">http://cityplanning.lacity.org/Code_Studies/Housing/CWCZ85x11102003.pdf</a>) and confirmed on the site's ZIMAS information page (<a href="http://zimas.lacity.org/report_pin.asp">http://zimas.lacity.org/report_pin.asp</a>). The nearest coastal zone is the Venice-Playa Del Rey coastal zone subarea, located approximately 11.0 miles southwest of the project site.</p>
<p><b>Sole Source Aquifers</b> [40 CFR 149]</p>	<p>Compliance steps are not invoked. The project is located in Los Angeles County which is not one of the three counties (Fresno, Santa Cruz, and Butte Counties) in California that contain designated sole-source aquifers. These findings are based on a review conducted December 17, 2009, of the EPA website (<a href="http://www.epa.gov/safewater/sourcewater/pubs/qrg_ssamap_reg9.pdf">http://www.epa.gov/safewater/sourcewater/pubs/qrg_ssamap_reg9.pdf</a>)</p>
<p><b>Endangered Species Act</b> [50 CFR 402]</p>	<p>Compliance steps are not invoked. A review of the California Department of Fish and Game California Natural Diversity Database (CNDDDB) was conducted on December 21, 2009. According to the review there is presence, within 0.5 mile of the project site, of seven species listed in the CNDDDB. The CNDDDB search found that there is the potential for the following sensitive animal species to be present on the project site: burrowing owl (<i>Athene cunicularia</i>), southwestern willow flycatcher (<i>Empidonax traillii extimus</i>), American badger (<i>Taxidea taxus</i>), big free-tailed bat (<i>Nyctinomops macrotis</i>), and the western mastiff bat (<i>Eumops perotis californicus</i>). In addition, the CNDDDB search found that occurrence of the prostrate vernal pool navarretia (<i>Navarretia prostrate</i>) is possible within 0.5 mile of the project site. Of these CNDDDB listed species, only the southwestern willow flycatcher is listed as endangered or potentially threatened. (See Appendix D)</p> <p>The proposed project is located in a fully developed urban area; therefore, few suitable open space habitats are available for wildlife on and in the immediate vicinity of the project site. No impacts related to habitats or endangered or threatened species are expected to occur as construction shall take place on a previously developed parking lot where no suitable wildlife habitat exists.</p>
<p><b>Wild and Scenic Rivers Act</b> [Sections 7 (b), (c)]</p>	<p>Compliance steps not invoked. Neither the City of Los Angeles nor the State of California contain any listed wild and/or scenic rivers in the National Wild and Scenic Rivers System. The closest river to the project site is the Los Angeles River located approximately 1.0 mile east of the project site; however, the Los Angeles River contains numerous man-made features and little scenic value making it ineligible for inclusion in the National Wild and Scenic Rivers System. Therefore, the project would not have an effect on the natural, free flowing, or scenic qualities of a river in the National Wild and Scenic Rivers System. These findings are based on a review of the National Wild and Scenic Rivers website, last updated on December 17, 2009. Available: (<a href="http://www.nps.gov/nrcr/programs/pwsr/index.htm">http://www.nps.gov/nrcr/programs/pwsr/index.htm</a>).</p>

Factors	Determination and Compliance Documentation
<p><b>Air Quality</b> [Clean Air Act, Sections 176 (c) and (d), and 40 CFR 6, 51, 93]</p>	<p>Compliance steps are not invoked. Per guidelines set forth by the U.S. Department of Housing and Urban Development (HUD), because the proposed project is in a non-attainment area for ozone (O<sub>3</sub>) and particulate matter (PM<sub>10</sub> and PM<sub>2.5</sub>), conformity with the State Implementation Plan (SIP) must be demonstrated. A project is shown to conform with the SIP if its criteria pollutant emissions remain below the local air district's significance thresholds and it is consistent with the local Air Quality Management Plan (AQMP).</p> <p>Based on an Air Quality Technical Memorandum (included as Appendix E), the proposed project's criteria pollutant emissions would be below the local air district's significance thresholds, and the project would be consistent with the AQMP. Therefore, no adverse effects would result.</p>
<p><b>Farmland Protection Policy Act</b> [7 CFR 658]</p>	<p>Compliance steps are not invoked. The project site does not include prime or unique farmland, or other farmland of statewide or local importance. These findings are based on a review conducted December 17, 2009, of the State Farmland Mapping and Monitoring Program maps for the County of Los Angeles. Available: (<a href="ftp://ftp.consrv.ca.gov/pub/dlrp/FMMP/pdf/2006/los06.pdf">ftp://ftp.consrv.ca.gov/pub/dlrp/FMMP/pdf/2006/los06.pdf</a>).</p>
<p><b>Environmental Justice</b> [Executive Order 12898]</p>	<p>The project is expected to result in beneficial effects on low-income and minority communities by increasing the supply of low-income housing and social services in the local community. The project is not expected to result in gentrification or increase in property values such that it would result in changes in the community's demographic character. The project's commercial uses would enhance income and provide employment opportunities for the local community. The residential and commercial opportunities presented by the project would be beneficial as it would bring new commercial services, provide affordable housing, provide social and community services to residents and allow for economic growth in the community, which is largely very low- to low-income and minority.</p>

HUD Environmental Standards	Determination and Compliance Documentation
<p><b>Noise Abatement and Control</b> [24 CFR 51 B]</p>	<p>The project site is subject to noise typical of an urban neighborhood. The most common noise source at the project site is traffic along Main Street and adjacent streets and alleys. Typical traffic noise results from automobiles, buses, trucks, and emergency vehicles with siren operation.</p> <p>The proposed project is a mixed-use residential and commercial development. These uses are compatible with the surrounding uses, which include primarily similar mixed use buildings housing first floor commercial uses with residential uses on upper levels. Based upon traffic data in the LADOT database, a noise assessment in accordance with HUD's Noise Guidebook was prepared by the City of Los Angeles in October 2007. The noise assessment has revealed a projected DNL (Day-</p>

HUD Environmental Standards	Determination and Compliance Documentation
	<p>night average sound level, also referred to as Ldn) of 73.8 dB for the year 2017 at the project site (Appendix I). A DNL between 65 decibel (dB) and 75 dB is “Normally Unacceptable” under HUD noise standards as per 24 CFR 51, and requires additional noise attenuation measures. While the noise assessment prepared by the City of Los Angeles did not include HUD form Figure 19, Description of Noise Attenuation Measures, the proposed mitigation measures and the planned noise attenuating building materials listed below shall provide adequate noise attenuation (Noise attenuation wall assembly plans at this stage in the project design are provided in Appendix I). The proposed project would be constructed in conformance with the Noise Insulation Standards of Title 24 of the California Building Code which requires an interior noise level of 45 dB Ldn/DNL and would ensure an acceptable interior noise environment. As such, the proposed project shall be constructed with additional noise attenuation materials consisting of exterior walls containing a gypsum wallboard material with cement panels and plaster with a sound transmission class (STC) rating of 55 to 59. Interior walls would be constructed of a similar gypsum wallboard or veneer base with a STC rating of 50 to 54. The floor/ceiling assembly would be constructed with a 3 ½ inch sound insulation material amounting to a STC rating of 50 to 54. The above listed building materials and assemblies would adequately attenuate interior noise levels to 45 dB DNL or below as per Title 24 of the California Building Code. The project’s outdoor use area consists of an enclosed courtyard, which would be shielded from traffic and other noise by the building structure. The following mitigation measures would further reduce both interior and exterior noise to acceptable levels.</p> <p style="text-align: center;"><b>Mitigation Measures</b></p> <ul style="list-style-type: none"> <li>• Exterior walls shall be airtight. All joints shall be grouted or caulked airtight. At the penetration of exterior walls by pipes, ducts, or conduits, the space between the wall and pipes, ducts, or conduits shall be caulked or filled with mortar.</li> <li>• Window assemblies shall have an STC rating of not less than 30.</li> <li>• Insulation material shall be at least two inches thick and shall be installed continuously throughout the cavity space behind the exterior sheathing and between wall studs.</li> <li>• The interior surface of the exterior walls shall be gypsum board or plaster at least ½ inch thick, installed on the studs. Continuous composition board, plywood, or gypsum board sheathing at least ½ inch thick shall cover the exterior side of the wall studs behind wood or metal siding. Asphaltic or wood shake shingles are acceptable in lieu of siding.</li> <li>• The applicant shall incorporate noise attenuating methods and devices to limit increased noise resulting from rooftop mechanical equipment, to no greater than a 3 decibel (dB) CNEL increase as measured at the property line.</li> </ul>

<b>HUD Environmental Standards</b>	<b>Determination and Compliance Documentation</b>
<p><b>Toxic/Hazardous/Radio active Materials, Contamination, Chemicals or Gases</b> [24 CFR 58.5(1)(2)]</p>	<p>A Phase I Environmental Site Assessment report was prepared by Pacific Environmental in October 2007 for the project site (Appendix F). In addition, a Pacific Environmental letter dated June 18, 2008, stated that the conclusions made in the October 2007 Phase I would not change so long as the subject property maintained the same ownership and use as were the conditions during the preparation of the original Phase I report.</p> <p>According to the Phase I report, the project site was not listed in any of the databases searched by Environmental Data Resources Inc. According to the Phase I, the State of California Department of Health Services (DHS) conducted a statewide radon survey during 1990- 1991, which entailed testing of radon in homes in designated geographic areas. The Phase 1 indicated that according to the DHS radon survey, and current correspondence with the DHS, radon concentrations in residences in the geographic region of the subject site average below 4 picocuries per liter (pCi/l). Therefore, radon is not anticipated to adversely affect the project site. Additionally, based on the Phase I, as the on-site parking lot was developed after historical improvements on the site were demolished in 1982, hazardous building materials are not considered a concern for this portion of site.</p> <p>Pacific Environmental prepared an Asbestos and Lead-Based Inspection Report for the project site in August 2007 (Appendix F). According to this report, no asbestos-containing materials were identified at the site during the inspection; however, lead-based paint and/or lead hazards were found to be present on the project site. As the proposed project would include the demolition of the existing structure located on the site, the potential for lead exposure exists. To ensure that these potential hazardous conditions are minimized, the following mitigation measures shall be implemented.</p> <p style="text-align: center;"><b>Mitigation Measures</b></p> <p>1. All lead related work shall be completed in accordance with the following regulations.</p> <ul style="list-style-type: none"> <li>• Title 17, California Code of Regulations, Division 1, Chapter 8: Accreditation, Certification and Work Practices for Lead-Based Paint and Lead Hazards.</li> <li>• Title 8, California Code of Regulations, Section 1532.1: Cal/OSHA Construction Safety Orders, Lead.             <ul style="list-style-type: none"> <li>▪ “Guidelines for the Evaluation and Control of Lead-Based Paint Hazards in Housing,” US Department of Housing and Urban Development, June 1995.</li> <li>▪ All waste generated from any lead related work must be properly profiled and disposed of. Waste manifests documenting the disposal site shall be submitted at the end of each phase of the job.</li> <li>▪ All future renovation, demolition, construction or abatement activities with the potential for disturbing identified ACM or LBP, be</li> </ul> </li> </ul>



<b>HUD Environmental Standards</b>	<b>Determination and Compliance Documentation</b>
	<p>performed by properly trained and qualified personnel. Certain interim measures shall be considered in cases where abatement is not immediately feasible or possible. These measures shall be addressed through the initiation of a formal Operations and Maintenance Program.</p>
<p><b>Siting of HUD-Assisted Projects near Hazardous Operations</b> [24 CFR 51 D]</p>	<p>Compliance steps are not invoked. The subject property is not located within the immediate vicinity of hazardous industrial operations handling fuel or chemicals of an explosive or flammable nature. According to HUD, threshold properties that are located near hazardous industrial operations handling fuels or chemicals of an explosive or flammable nature are subject to HUD safety standards (24 CFR 51, Subpart C). In the case of tanks containing common liquid fuels, the requirement for an acceptable separation distance (ASD) calculation only applies to storage tanks that have a capacity of more than 100 gallons.</p> <p>According to the Phase I Environmental Site Assessment prepared for the project site, no facilities that handle the above mentioned explosive or flammable hazardous chemicals exist on or in the immediate vicinity of the project site.</p>
<p><b>Airport Clear Zones and Accident Potential Zones</b> [24 CFR 51 D]</p>	<p>Compliance steps are not invoked. The subject property is not located within 2,500 feet of the end of a civil airport runway or 8,000 feet of the end of a military airfield runway, as required for HUD-funded projects. There are no airports located within the vicinity of the project site. The nearest airport is Los Angeles International Airport, located approximately 10.5 miles southwest of the project site.</p>

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## ENVIRONMENTAL ASSESSMENT CHECKLIST

*[Environmental Review Guide HUD CPD 782.24 CFR 58.40; Ref. 40 CFR 1508.8 & 1506.27]*

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. Then 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.

Land Development	Code	Source or Documentation
Conformance with Comprehensive Plans and Zoning	1	<p>The General Plan land use designation for the project site is Community Commercial (Commercial), and the zoning is C4-2D. The proposed project involves a mixed-use residential and commercial development on a site planned and zoned for commercial uses. According to the Los Angeles Municipal Code (LAMC) 2009, a multiple dwelling use is permitted as a mixed-use project with a maximum height of 150 feet above grade as per the C4-2D zone; the proposed project would erect a six-story building approximately 100 feet in height.</p> <p>In addition, as per LAMC ordinance #179,076, effective September 23, 2007, any residential (including Apartment Hotel or mixed-use) building located within the Greater Downtown Housing Incentive Area requires a site plan review and approval by the Department of City Planning. A site plan review (See Appendix G) was completed and approved by the Department of City Planning on July 25, 2008 making the following findings pertaining to plans and zoning:</p> <ul style="list-style-type: none"> <li>• The proposed project complies with all applicable provisions of the Los Angeles Municipal Code and any applicable specific plan</li> <li>• The proposed project is consistent with the adopted City of Los Angeles General Plan</li> <li>• The proposed project is consistent with any applicable adopted Redevelopment Plan</li> <li>• The Proposed Project is or shall be consistent with existing and future development on neighboring properties</li> </ul> <p>Six commercial parking spaces shall be provided in the subterranean parking lot to serve the planned 2,400 square feet of commercial space of the planned building as per LAMC Section 12.21 A4 (x)(3) which requires 1 parking space per every 500 square feet of</p>

Land Development	Code	Source or Documentation
		<p>commercial use. Pursuant to LAMC Section 12.21 (4)(a) the proposed project would be required to provide a parking space for each dwelling unit; however, since the project is located in the Greater Downtown Incentive Area, no parking spaces are required for dwelling units set-aside for individuals earning less than 50% of the area mean income. As such, the 23 residential parking spaces and 6 commercial parking spaces being provided by the proposed project would conform with LAMC parking policies and requirements.</p> <p>See Appendix G, Site Plan Review, for further discussion of plan and zoning conformance.</p>
Compatibility and Urban Impact	1	<p>The proposed project includes residential and commercial uses. The project site is surrounded by similar mixed use buildings housing first floor commercial uses with residential uses on upper levels. At 6 stories, the proposed project would be neither too tall nor diminutive of its surroundings as most buildings in the vicinity have heights ranging from 2 stories to 10 stories. In addition, prior to issuance of a building permit, the Los Angeles Community Redevelopment Agency (CRA/LA) must review site plans and make a determination that the project complies with the Urban Design Standards and Guidelines for Downtown Los Angeles. As such, the project would be compatible with nearby existing urban uses.</p>
Slope	1	<p>According to Exhibit C of the Safety Element of the City's General Plan, the project site is not located in an area designated at risk of landslide. Project construction activities are not expected to increase the risk of landslide at the site, and all grading and building activities shall be in compliance with the City's Building and Grading codes.</p>

Land Development	Code	Source or Documentation
Erosion	4	<p>The project site is entirely paved and mantled by artificial fill consisting of course-grain sand, gravel, and minor construction debris. Upon completion of the proposed project, the site would remain entirely paved and therefore, erosion is unlikely to occur. The grading of the site would result in the removal of the artificial fill and surface exposure of underlying alluvium during construction which may result in adverse effects related to erosion. This effect would be reduced by the incorporation of construction-period mitigation measures as listed in the Air Quality section. All construction activity shall proceed in compliance with standard City requirements and Los Angeles Regional Water Quality Control Board regulations to limit erosion during construction. The project would include all necessary improvements, including stormwater runoff controls to accommodate and direct stormwater to local and regional drainage facilities. Implementation of applicable stormwater regulations will further minimize erosion from the site.</p>
Soil Suitability	4	<p>The project site is located in Southern California, which is subject to strong periodic seismic ground shaking due to local and regional geology. According to the Safety Element of the City’s General Plan, Exhibit A, the site is not located in an Alquist-Priolo Special Study Zone.</p> <p>The project site is level and according to the Safety Element of the City’s General Plan, Exhibit C, the project site not susceptible to landslides. According to the Safety Element of the City’s General Plan, Exhibit B, the project site is not located in a designated liquefaction zone, and is not anticipated to become unstable due to construction of the project.</p> <p>Based on investigation by GEOCON Inland Empire Inc. published in an October, 2007 geotechnical report (See Appendix H), the soils underlying the project site consist of artificial fill over alluvium and bedrock. While no noticeably adverse geologic conditions were identified on the site to preclude construction of the proposed development, the following mitigation measures are recommended in the geotechnical report to prevent adverse conditions resulting from excavation and grading activities.</p> <p style="text-align: center;"><b>Mitigation Measures</b></p> <ol style="list-style-type: none"> <li>1. Due to the depth of the proposed excavation and the proximity to the property lines, excavation of</li> </ol>



Land Development	Code	Source or Documentation
		<p>the proposed subterranean level will require sloping and shoring measures in order to provide a stable excavation. Where shoring is required a soldier pile shoring system shall be utilized. Recommendations for shoring are provided in Section 6.14 of the geotechnical report prepared for the project.</p> <p>2. Grading, foundation, and shoring plans shall be reviewed by a geotechnical engineer prior to finalization to verify that the plans were prepared in conformance with the recommendations made in the geotechnical report prepared by GEOCON Inland Empire, Inc. and to provide additional analyses or recommendations. Earthwork shall be observed, and compacted fill tested. If necessary, the existing uncertified fill and alluvial soil encountered during exploration is suitable for re-use as an engineered fill provided any oversize material and debris is removed. All imported fill shall be observed, tested and approved prior to use in the building area. Imported soils used in the building area shall have an expansion index less than 20.</p>
<p>Hazards and Nuisances including Site Safety</p>	<p>4</p>	<p>Risk from liquefaction of the underlying soil is addressed above in "Soil Suitability."</p> <p>On-site security measures have been incorporated into the design of the development. Both the pedestrian and the vehicular entries would be gated to secure tenants' and staff's entry into the building. The ground floor lobby would be secured by an intercom/buzzer-controlled door that could be opened only by a resident with a key card or by the property management staff. Tenants would have key cards that allow the manager to monitor access in and around the building. All visitors would be required to register and provide photo identification before entering the building. Cameras would be located near any potential access point not within sight of the main desk.</p> <p>A Phase I Environmental Site Assessment was prepared for the site by Pacific Environmental in October 2007. According to the Phase I, there is no evidence of recognized environmental conditions at either of the parcels on the subject property resulting from the present or historical use of the site. The Phase I indicated that although the Sanborn maps appear to show that a sign painting business operated in the basement of the Genesis Hotel building from</p>

Land Development	Code	Source or Documentation
		<p>approximately 1950 through 1970, there were no visual or regulatory indications of contamination associated with this historical use of the subject property. As such, the Phase I does not recommend additional assessment work at the site.</p> <p>Pacific Environmental Company prepared an Asbestos and Lead-Based Inspection Report for the project site in August 2007. According to this report, no asbestos-containing materials were identified at the site during the inspection. As the proposed project would include the demolition of the existing structure located on the site, the potential for lead exposure exists. To ensure that these potential hazardous conditions are minimized, the following mitigation measures shall be implemented.</p> <p style="text-align: center;"><b>Mitigation Measures</b></p> <p>1. All lead related work shall be completed in accordance with the following regulations.</p> <ul style="list-style-type: none"> <li>• Title 17, California Code of Regulations, Division 1, Chapter 8: Accreditation, Certification and Work Practices for Lead-Based Paint and Lead Hazards.</li> <li>• Title 8, California Code of Regulations, Section 1532.1: Cal/OSHA Construction Safety Orders, Lead. <ul style="list-style-type: none"> <li>▪ “Guidelines for the Evaluation and Control of Lead-Based Paint Hazards in Housing,” US Department of Housing and Urban Development, June 1995.</li> <li>▪ All waste generated from any lead related work must be properly profiled and disposed of. Waste manifests documenting the disposal site shall be submitted at the end of each phase of the job.</li> <li>▪ All future renovation, demolition, construction or abatement activities with the potential for disturbing identified ACM or LBP, be performed by properly trained and qualified personnel.</li> <li>▪ Certain interim measures shall be considered in cases where abatement is not immediately feasible or possible. These measures shall be addressed through the initiation of a formal Operations and Maintenance Program.</li> </ul> </li> </ul>
Energy Consumption	1	The project shall incorporate energy conservation requirements pursuant to Title 24 of the California

Land Development	Code	Source or Documentation
		<p>Building Code. These standards include policies affecting building envelope, building Heating Ventilation and Air Conditioning (HVAC) requirements, water heating requirements, lighting, and overall performance methods. In addition, design, construction, and operation of the proposed project would seek the U.S. Green Building Council’s (USGBC) Leadership in Energy and Environmental Design (LEED) silver rating through adherence to various USGBC standards pertaining to energy efficiency and performance, among others. A LEED silver rating would ensure that the project exceeds the energy conservation standards pursuant to Title 24 of the California Building Code by at least 10%. Some of the measures that will also help reduce the development’s energy footprint include using recycled construction materials such as carpet and bathroom tiles wherever possible. In addition, drought-tolerant landscaping elements shall be incorporated into the project design. As such, the proposed project would result in improvements to energy efficiency on the project site.</p>
<p>Noise [Contribution to Community Noise Levels]</p>	<p>4</p>	<p>The proposed project is a mixed-use residential and commercial development. These uses are compatible with surrounding uses, which include primarily similar mixed use buildings housing first floor commercial uses with residential uses on upper levels.</p> <p>The project is not expected to have an adverse effect on ambient noise levels in the community, as it would be compatible with existing, surrounding uses. As stated in the “Transportation” section below, the proposed project would not generate an increase in vehicle trips in the project site vicinity. Therefore no increase in community ambient noise would occur due to the building’s operation or to an increase in existing traffic noise.</p> <p>However, construction of the proposed project will generate additional noise. Construction noise is regulated by the City’s Municipal code.</p> <p>The evaluation of project construction noise impacts is based on typical noise level emissions during domestic housing construction, as developed for the U.S. EPA (EPA 1971). Project-related construction would result in short-term increases in noise levels. The nearest residences to the project site are located approximately 50 feet from the project centroid.</p>

Land Development	Code	Source or Documentation
		<p>Therefore, noise levels from construction at adjacent noise-sensitive land uses would be in excess of the City’s 75 dBA standard for construction noise (LA Municipal Code).</p> <p>Construction noise is unavoidable and could adversely affect some nearby residents during construction activity periods. However, the noise would be temporary and limited to the duration of the construction in any one location. The following measures shall be incorporated into the project contract specifications to minimize construction noise effects.</p> <p style="text-align: center;"><b>Mitigation Measures</b></p> <p>The following mitigation measures were included in the Mitigated Negative Declaration prepared for the proposed project by the City of Los Angeles:</p> <ol style="list-style-type: none"> <li>1. The project shall comply with City of Los Angeles Noise Ordinance Nos. 144,331 and 161,574, and any subsequent ordinances, which prohibit the emission and creation of noise beyond certain levels at adjacent uses unless technically infeasible</li> <li>2. Construction and demolition shall be restricted to the hours of 7:00 a.m. to 6:00 p.m. Monday through Friday, and 8:00 a.m. to 6:00 p.m. on Saturday.</li> <li>3. Construction and demolition activities shall be scheduled so as to avoid operating several pieces of equipment simultaneously.</li> <li>4. The project contractor shall use power construction equipment with state-of-the-art noise shielding and muffling devices.</li> <li>5. The project shall comply with the Noise Insulation Standards of Title 24 of the California Code Regulations, which ensure an acceptable interior noise environment.</li> </ol> <p>The following mitigation measures have been included to further mitigate construction noise:</p> <ol style="list-style-type: none"> <li>6. All mobile or fixed noise-producing equipment used on the project that is regulated for noise output by a local, state, or federal agency shall comply with such regulation while in the course of project activity.</li> <li>7. Electrically powered equipment instead of</li> </ol>

Land Development	Code	Source or Documentation
		<p>pneumatic or internal combustion powered equipment shall be used, where feasible.</p> <p>8. Material stockpiles and mobile equipment staging, parking, and maintenance areas shall be located as far as practicable from noise-sensitive receptors.</p> <p>9. Construction site and haul-road speed limits shall be established and enforced during the construction period.</p> <p>10. The hours of construction including noisy maintenance activities and all spoils and material transport shall be restricted to the periods and days permitted by the local noise or other applicable ordinance. The only exception to this mitigation should be inaudible underground tunneling or similar construction activity. Noise-producing project activity shall comply with local noise control regulations affecting construction activity or obtain exemptions therefrom.</p> <p>11. The use of noise-producing signals, including horns, whistles, alarms, and bells shall be for safety warning purposes only.</p> <p>12. No project-related public address or music system shall be audible at any adjacent receptor.</p> <p>13. The onsite construction supervisor shall have the responsibility and authority to receive and resolve noise complaints. A clear appeal process to the Owner shall be established prior to construction commencement that will allow for resolution of noise problems that cannot be immediately solved by the site supervisor.</p> <p>14. The contractor shall develop a project noise control plan, which shall have been approved and implemented prior to commencement of any construction activity.</p> <p>15. Noise control features and plans shall be reviewed and approved by a noise control engineering professional.</p> <p>16. Contract incentives may be offered to the construction contractor to minimize or eliminate noise complaints resulting from project activities where project construction would result in significant noise impacts.</p> <p>17. The emplacement of berms or erection of temporary soundwall barriers shall be considered</p>



Land Development	Code	Source or Documentation
		<p>where project activity is unavoidably close to noise-sensitive receptors.</p> <p>18. Planting of trees and shrubbery while useful for visual screening is not an effective noise control mechanism and is not considered a noise control or mitigation measure for noise impacts.</p>
<p>Air Quality [Effects of Ambient Air Quality on Project and Contribution to Community Pollution Levels]</p>	<p>4</p>	<p><b>Effects of Ambient Air Quality on Project</b> The project site is in a non-attainment area for several criteria pollutants; however, the project shall conform to the applicable air quality management plan. Accordingly, the project will not adversely affect air quality. For a discussion of the basis for this finding, refer to “Air Quality” in the Statutory Checklist, above, as well as the Air Quality Memo in Appendix E.</p> <p><b>Contribution to Community Pollution Levels</b> According to the Air Quality Memo prepared for this project (see Appendix E), criteria pollutant emissions during construction and operation of the project would remain below the applicable significance thresholds and would conform with the local Air Quality Management Plan.</p> <p>Although the proposed project would not generate substantial adverse effects pertaining to air quality during construction or operation, the following mitigation measures will help reduce any effects and ensure they are not adverse.</p> <p><b>Mitigation—Short-Term Construction Air Quality</b></p> <ol style="list-style-type: none"> <li>1. All unpaved demolition and construction areas shall be wetted at least twice daily during excavation and construction, and temporary dust covers shall be used to reduce dust emissions and meet SCAQMD District Rule 403. Wetting could reduce fugitive dust by as much as 50%.</li> <li>2. The owner or contractor shall keep the construction area sufficiently dampened to control dust caused by construction and hauling, and at all times provide reasonable control of dust caused by wind.</li> <li>3. All loads shall be secured by trimming, watering, or other appropriate means to prevent spillage and dust.</li> <li>4. All materials transported off site shall be either sufficiently watered or securely covered to prevent excessive amounts of dust.</li> <li>5. All clearing, earth moving, or excavation activities shall be discontinued during periods of high winds (i.e., greater than 15 mph), so as to</li> </ol>

Land Development	Code	Source or Documentation
		<p>prevent excessive amounts of dust.</p> <p>6. General contractors shall maintain and operate construction equipment so as to minimize exhaust emissions.</p> <p><b>Mitigation—Operation Air Quality</b></p> <p>1. An air filtration system shall be installed and maintained for the residences with filters meeting or exceeding the ASHRAE Standard 52.2 Minimum Efficiency Reporting Value (MERV) of 11, to the satisfaction of the Department of Building and Safety.</p>
<p>Environmental Design [Visual Quality—Coherence, Diversity, Compatible Use and Scale ]</p>	<p>2</p>	<p>The project site is a 0.4-acre site located on the 400 block of Main Street, between 5<sup>th</sup> Street and Winston Street. The site is currently occupied by an existing two-story SRO hotel building and a surface parking lot. The proposed mixed-use buildings would consist of six floors of apartment units with commercial space on the ground floor and a single-level subterranean parking garage. A community oriented, open-air courtyard would be located in the center of the development to provide recreational and open space for residents.</p> <p>The City of Los Angeles Master Plan and Central City Community Plan have consciously created physical and visual connections to the historic buildings and the surrounding mixed-use commercial buildings. The height, scale, color, massing, and use of the proposed project would be consistent with those of neighboring buildings.</p> <p>The proposed project shall adhere to the provisions of the Planning and Zoning Ordinances of the City Municipal Code, as well as the design standards of the Community Plan for the neighborhood.</p> <p>In addition, design, construction, and operation of the proposed project would seek the U.S. Green Building Council’s (USGBC) Leadership in Energy and Environmental Design (LEED) silver rating through adherence to various USGBC standards pertaining to energy efficiency and performance, among others.</p>

Socioeconomic	Code	Source or Documentation
Demographic Character Changes	1	<p>The project is located in a low-income and minority community. The proposed project would provide affordable housing options and commercial uses in the community. The project is not expected to result in gentrification or increase in property values such that it would result in changes in the community's demographic character.</p>
Displacement	1	<p>The project site consists of an existing single resident occupancy hotel building and a surface parking lot, both of which are owned by the project proponent. Half of the surface parking lot is currently leased to the County of Los Angeles; however, the lease expires at the beginning of 2010. Both the two story hotel building and the surface parking lot would be demolished as part of the project.</p> <p>While 29 housing units at the Genesis Hotel would be removed as part of the project, 106 housing units would be constructed in their place and therefore, a net increase in available housing would result from the project. Furthermore, the tenants of the existing hotel building have all been relocated in accordance with the Uniform Relocation Act, to other similar housing developments throughout the city and therefore, the proposed project would not result in displacement of existing residents. The proposed project would not involve or cause the construction of replacement housing elsewhere.</p> <p>The existing surface parking lot is currently partially leased to the County of Los Angeles; however, the lease will end at the beginning of 2010. Even though the existing 32 space parking lot would be removed, in kind, adequate parking, approximately 29 spaces, would be provided with development of the proposed project. Though the project would result in a net loss of 3 parking spaces, the existing 32 space parking lot is not open to the public and the planned 29 space subterranean parking lot would provide 6 parking spaces for commercial uses which would result in an increase of public parking. Furthermore, adequate parking for the area is already provided by the six-story parking structure located opposite the project site on Main Street. Therefore, no adverse effect is anticipated.</p>
Employment and Income Patterns	2	<p>The proposed project is expected to result in a beneficial effect by providing employment in a low-income and minority area of the City of Los Angeles. The project's commercial uses would enhance income</p>

Socioeconomic	Code	Source or Documentation
		and provide employment opportunities for the local community. While the provision of this employment and wage income would be nominal at the regional level, it will provide an important local element to the low-income and minority community where it is located.

Community Facilities and Services	Code	Source or Documentation
Educational Facilities	4	<p>There are no schools within 0.5 mile of the project site. The nearest schools serving the project site include Los Angelitos Early Education Center (P-K), 9<sup>th</sup> Street Elementary (K-6), MacArthur Park Primary Center (K-1), Esperanza Elementary School (K-5), Charles White Elementary School (K-5), Camino Nuevo Charter Academy (K-8), John H. Liechty Middle School (6-8), Los Angeles Academy of Arts and Enterprise (6-9), McAlister High School (6-12), Belmont Senior High School (9-12), and Design High School (9-12).</p> <p>The proposed project would construct 98 residential efficiency units designed for single occupants and therefore children are not likely to reside at the planned housing development. The remaining 8 units would be constructed as loft units for building management and very low-income residents who may have children. While it is unlikely that the proposed project would result in any significant increase to the local student population the following mitigation measure would ensure that there are no adverse effects on existing educational facilities.</p> <p style="text-align: center;"><b>Mitigation Measure</b></p> <ol style="list-style-type: none"> <li>1. The project proponent shall pay all required school fees to the Los Angeles Unified School District to offset the effect of additional student enrollment at schools serving the project area.</li> </ol>
Commercial Facilities	1	<p>The proposed project is not expected to generate a substantial demand for commercial facilities. Furthermore, the project includes approximately 2,400 commercial uses as part of the development. At this stage, it is too early to determine the final commercial tenants for the project. However, the project proponent anticipates a large retail client as well as</p>

Community Facilities and Services	Code	Source or Documentation
		several smaller uses such as coffee shops and restaurants. These commercial uses are consistent with those allowed by the City’s Community Plan.
Health Care	1	There are adequate health care facilities located within the City of Los Angeles to serve the project site and its vicinity. The proposed project is not anticipated to have an adverse effect on health care services for the neighborhood as it would only add 106 residential units, which is not a substantial increase in population such that additional health care facilities or providers would be required to serve the project site and its surroundings.
Social Services	2	The proposed mixed-use residential and commercial development would be relatively small within the city-wide and regional context, and would not substantially contribute to the demand for social services. Furthermore, various social services such as case management and support groups would be provided to residents on the premises. By providing needed affordable housing in the low-income and minority community of the Central City and Skid Row, the project may contribute to reducing demand for affordable housing social services.
Solid Waste	4	<p>Environmental effects on existing solid waste facilities may result from project implementation due to the generation of additional solid waste. Solid waste transport services within the City of Los Angeles are provided by City staff and by private contractors. Using a solid waste generation factor of 12.23 pounds per housing unit per day (City of Los Angeles CEQA Threshold Guide), the projected daily solid waste resulting from the proposed project would be approximately 1,296 pounds per day. While existing landfills serving the City of Los Angeles have adequate capacity for this relatively small increase in solid waste, the need for additional capacity at landfills is always present, with such a large metropolis as Los Angeles. According the City of Los Angeles’ Mitigated Negative Declaration for the project, potential adverse effects resulting from the proposed project shall be mitigated by the following measures.</p> <p style="text-align: center;"><b>Mitigation Measures</b></p> <ol style="list-style-type: none"> <li>1. Recycling bins shall be provided at appropriate locations to promote recycling of paper, metal, glass, and other recyclable material. These bins</li> </ol>



Community Facilities and Services	Code	Source or Documentation
		<p>shall be emptied and recycled accordingly as a part of the project's regular solid waste disposal program.</p> <ol style="list-style-type: none"> <li>2. Prior to the issuance of any demolition or construction permit, the applicant shall provide a copy of the receipt or contract from a waste disposal company providing services to the project, specifying recycled waste service(s), to the satisfaction of the Department of Building and Safety. The demolition and construction contractor(s) shall only contract for waste disposal services with a company that recycles demolition and/or construction-related wastes.</li> <li>3. To facilitate onsite separation and recycling of demolition and construction-related wastes, the contractor(s) shall provide temporary waste separation bins on site during demolition and construction. These bins shall be emptied and recycled accordingly as a part of the project's regular solid waste disposal program.</li> </ol>
Waste Water	1	<p>For its wastewater treatment needs, the City of Los Angeles utilizes the Hyperion Treatment Plant (HTP), the Tillman Water Reclamation Plant (TWRP), the Los Angeles Glendale Water Reclamation Plant (LAGWRP), and the Terminal Island Treatment Plant (TITP). Two contract agency plants also treat some City flows: the Burbank Water Reclamation Plant and the Los Angeles County Joint Water Pollution Control Plant (JWPCP). The Hyperion Treatment System, which consists of the HTP and the upstream TWRP and LAGWRP, provides the majority of Los Angeles' treatment needs. The City has planned increases in plant capacities by the year 2010 for LAGWRP, from 20 million gallons per day (mgd) to 50 mgd; and HTP, from 420 mgd to 900 mgd. Though the former has received regulatory approval, it has not been funded by the 10-year Capital Improvements Program, and expansion at this location may or may not prove necessary by 2010. These findings were obtained from Chapter 9 of the Goals, Objectives, and Policies of the Framework Element of the City General Plan. Per findings in the City's Mitigated Negative Declaration (MND) for the proposed project, the City has determined that a less-than-significant or no impact to wastewater would occur as a result of the proposed project and the increase in wastewater can</p>

Community Facilities and Services	Code	Source or Documentation
		<p>be accommodated by the wastewater treatment provider. The construction of this proposed mixed-use project would not require the construction of new water or wastewater treatment facilities or the expansion of existing facilities. The proposed mixed-use project would not exceed the wastewater treatment requirements of the Los Angeles Regional Water Quality Control Board.</p>
Stormwater	4	<p>Per City guidelines, the project will be required to control stormwater runoff using best management practices (BMPs) and a retention basin. After implementation of mitigation measures, the project would not result in an adverse effect on stormwater.</p> <p style="text-align: center;"><b>Mitigation Measures</b></p> <ol style="list-style-type: none"> <li>1. Project applicants shall implement stormwater BMPs to treat and infiltrate the runoff from a storm event producing ¾ inch of rainfall in a 24-hour period. The design of structural BMPs shall be in accordance with the <i>Development Best Management Practices Handbook</i>, Part B Planning Activities. A signed certificate from a California licensed civil engineer or licensed architect that the proposed BMPs meet this numerical threshold standard is required.</li> <li>2. Post-development peak stormwater runoff discharge rates shall not exceed the estimated pre-development rate for developments where the increased peak stormwater discharge rate will result in increased potential for downstream erosion.</li> <li>3. Trees and other vegetation shall be maximized at each site by planting additional vegetation, clustering tree areas, and promoting the use of native and/or drought tolerant plants.</li> <li>4. Any connection to the sanitary sewer must have authorization from the Bureau of Sanitation.</li> <li>5. Impervious surface area shall be reduced by using permeable pavement materials where appropriate, including: pervious concrete/asphalt; unit pavers, i.e., turf block; and granular materials, i.e., crushed aggregates, cobbles.</li> <li>6. Roof runoff systems shall be installed where site is suitable for installation. Runoff from rooftops is relatively clean, and can provide groundwater recharge and reduce excess runoff into storm</li> </ol>

Community Facilities and Services	Code	Source or Documentation
		<p>drains.</p> <p>7. Messages shall be painted adjacent to storm drain inlets prohibiting the dumping of improper materials into the storm drain system. Prefabricated stencils can be obtained from the Department of Public Works, Stormwater Management Division.</p> <p>8. All storm drain inlets and catch basins within the project area shall be stenciled with prohibitive language (such as NO DUMPING—DRAINS TO OCEAN) and/or graphical icons to discourage illegal dumping.</p> <p>9. Signs and prohibitive language and/or graphical icons, which prohibit illegal dumping, shall be posted at public access points along the channels and creeks within the project area.</p> <p>10. Legibility of stencils and signs shall be maintained.</p> <p>11. Materials with the potential to contaminate stormwater must be (a) placed in an enclosure such as, but not limited to, a cabinet, shed, or similar stormwater conveyance system; or (b) protected by secondary containment structures such as berms, dikes, or curbs. The storage area must be paved, sufficiently impervious, and must be sheltered by a roof or awning to minimize collection of stormwater.</p> <p>12. An efficient irrigation system shall be designed to minimize runoff including: drip irrigation for shrubs to limit excessive spray, shutoff devices to prevent irrigation after significant precipitation, and flow reducers.</p> <p>13. Appropriate erosion control and drainage devices such as interceptor terraces, berms, vee-channels, and inlet and outlet structures shall be incorporated into the project design as specified by Section 91.7013 of the Building Code.</p> <p>14. The owner(s) of the property shall prepare and execute a covenant and agreement (Planning Department General form CP-6770) satisfactory to the Planning Department binding the owners to post-construction maintenance on the structural BMPs in accordance with the Standard Urban Stormwater Mitigation Plan and or per manufacturer's instructions.</p>

Community Facilities and Services	Code	Source or Documentation
Water Supply	1	<p>Per the City’s findings in the CEQA MND, the City has determined that the Department of Water and Power has adequate water supplies to serve this mixed-use project. Furthermore, the proposed project shall incorporate various design measures for construction and operation of the project that would help reduce and prevent impacts on water supply. These measures are described in the list of conditions for approval in the “Introduction” to this document under “XV. Utilities (Local or Regional Water Supplies)”. The increase of water usage would not result in a substantial adverse effect.</p>
Public Safety - Police	1	<p>The project site is served by the Los Angeles Police Department Central Community Police Station located at 251 East 6<sup>th</sup> Street. Secondary service would be provided by the Los Angeles Police Department Rampart Community Police Station located at 1401 West 6<sup>th</sup> Street.</p> <p>The proposed mixed-use project would not result in an increase in police response times. In addition, on-site security measures, have been incorporated into the design of the development. Both the pedestrian and the vehicular entries would be gated to secure tenants’ and staff’s entry into the building. The ground floor lobby would be secured by an intercom/buzzer-controlled door that could be opened only by a resident with a key card or by the property management staff. Tenants would have key cards that allow the manager to monitor access in and around the building. Tenants’ rooms would lock securely, and all visitors would be required to register and provide photo identification before entering the building. Cameras would be located near any potential access point not within sight of the main desk. Therefore, no adverse effect would result.</p>
- Fire	4	<p>The Los Angeles Fire Department Fire Station No. 9 is located at 430 East Seventh Street, approximately 0.6 mile from the project site. Additionally, the Los Angeles Fire Department Fire Station No. 11, located at 1819 West 7<sup>th</sup> Street, is located approximately 1.8 miles from the project site.</p> <p>The proximity of the project to these stations would result in quick emergency response times to the site. However, adverse effects may result from project implementation due to the location of the project in an</p>

Community Facilities and Services	Code	Source or Documentation
		<p>area with marginal fire protection facilities due to the large population size and density. This potential adverse effect will be mitigated by implementing the following measures.</p> <p style="text-align: center;"><b>Mitigation Measures</b></p> <p>The following recommendations of the Fire Department relative to fire safety shall be incorporated into the building plans:</p> <ol style="list-style-type: none"> <li>1. Submittal of a plot plan for approval by the Fire Department either prior to the recordation of a final map or the approval of a building permit.</li> <li>2. The plot plan shall include the following minimum design features: fire lanes, where required, shall be a minimum of 20 feet in width; all structures must be within 300 feet of an approved fire hydrant; and entrances to any dwelling unit or guest room shall not be more than 150 feet in distance in horizontal travel from the edge of the roadway of an improved street or approved fire lane.</li> </ol>
<p>- Emergency Medical</p>	<p>1</p>	<p>The proposed project's 106 residential units would result in a minimal increase in population and would increase emergency medical response times, and thus no adverse effect is expected. Both LADOT and LAFD shall review the project's emergency access to ensure that the project meets fire code standards for emergency access.</p>
<p>Open Space and Recreation - Open Space</p>	<p>2</p>	<p>The proposed project is not expected to have an adverse effect on open space in the community. The project site is currently occupied by the two-story Genesis Hotel and a surface parking lot. The current site condition does not provide publically accessible open space nor does it contain an attractive and unique aesthetic landscape.</p> <p>The proposed project would create a mixed-use project consisting of residential and commercial retail uses with pedestrian access, as well as landscape and design improvements to the site. The building would feature a centralized open space plaza on the first floor with drought tolerant landscaping and community amenities.</p>
<p>- Recreation</p>	<p>4</p>	<p>Four parks and/or open space areas are located within a 2-mile radius of the project site. Pershing Square is located within one mile to the west. Grand Hope Park is located within a one-mile radius to the southwest.</p>



Community Facilities and Services	Code	Source or Documentation
		<p>MacArthur Park and Lafayette Park are located approximately two miles northwest of the project site. The increased demand and use of parks, open space, and recreation facilities shall be mitigated by the implementation of the following mitigation measure.</p> <p style="text-align: center;"><b>Mitigation Measure</b></p> <p>1. Per Section 17.12-A of the LA Municipal Code, the owner/developer shall pay the applicable Quimby fees for the construction of condominiums, or Recreation and Park fees for construction of apartment buildings.</p>
- Cultural Facilities	4	<p>The increased demand and use of cultural facilities due to a small increase in population size would be mitigated by the implementation of the following mitigation measure.</p> <p style="text-align: center;"><b>Mitigation Measure</b></p> <p>1. Per Section 17.12-A of the LA Municipal Code, the owner/developer shall pay the applicable Quimby fees for the construction of condominiums, or Recreation and Park fees for construction of apartment buildings.</p>
Transportation	1	<p>The proposed mixed-use project, which would contain 98 efficiency apartment units, 8 loft units and approximately 2,400 square feet of commercial space, would replace an existing two-story SRO hotel building and a surface parking lot. The project would be similar to adjacent mixed-use structures containing commercial space on the first floor and residential space on upper floors and would not result in a substantial increase in traffic in relation to the existing traffic load and capacity of the street system. The Site Plan Review Transportation Analysis for the project (Prepared by Weston Pringle, 2008), found in Appendix G, confirmed these findings by evaluating projected traffic growth based upon existing and future uses of the site. The above referenced transportation analysis, conducted by the city, concluded that a traffic study for the proposed project was not required.</p> <p><b>Transit:</b> The proposed project would not conflict with any alternative transportation policies. The Central City community is well served by public transit services provided by Metro and the City of Los Angeles Department of Transportation (LADOT). Several Metro and LADOT bus routes have stops</p>

Community Facilities and Services	Code	Source or Documentation
		<p>immediate to the project site. These routes include Metro lines 18, 33, 53/55, 62, 83, 92, 333, 355, 460 and Metro Rapid 720/728 and 753. The LADOT DASH Route D, Union Station bus operates along Main Street. The project is also located approximately 0.25 miles east of Metro’s Pershing Square Red/Purple Line Subway Station. These bus stops and the subway station operation would not be affected by the proposed project, and, as a result, no impact on transit would result from implementation of the proposed project.</p> <p><b>Access:</b> Existing pedestrian and vehicular access to the site is presently available on Main Street. The proposed project would feature pedestrian access to the site on Main Street, while vehicular access into the subterranean parking garage would be made available to residents and commercial patrons on Werdin Place. Prior to construction, a parking and driveway plan shall be submitted to the City of Los Angeles Bureau of Engineering and LADOT for review and approval. Therefore, no adverse effect on access to the site as a result of implementing the proposed project is expected.</p> <p><b>Parking:</b> Pursuant to Section 12.21A(4) (a) of the Los Angeles Municipal Code (LAMC), the parking requirement for the proposed project is at least one parking space for each dwelling unit. However, pursuant to Ordinance No. 179076, the Greater Downtown housing Incentive Area Ordinance, no parking spaces are required for dwelling units dedicated to or set-aside for households that earn less than 50% of the Area Median Income (AMI) as determined by the Los Angeles Housing Department. Based upon the planned use of the proposed development and the economic composition of future tenants, 23 parking spaces would be required for residential purposes. The project would include 23 residential parking spaces, therefore complying with this requirement of the LAMC.</p> <p>For commercial uses, Section 12.21A (4) (c) of the LAMC requires at least one parking spaces per 500 square feet of gross floor area of retail use. Therefore, there is a parking requirement of 5 spaces for the 2,400 square feet of retail use. As currently proposed, the project would provide 6 parking spaces for commercial purposes and therefore would comply with this requirement of the LAMC.</p>

Community Facilities and Services	Code	Source or Documentation
		<p>The proposed project would result in the removal of an approximate 32 space surface parking facility located adjacent to the existing Genesis Hotel. Sixteen of the 32 parking spaces are currently leased to the County of Los Angeles by the project proponent; however, the lease shall expire prior to 2010 and shall not be renewed. The remaining 16 spaces are used by project proponent staff and Genesis Hotel personnel. Removal of the 32 space surface parking lot would not result in adverse effects to local parking facilities as the existing parking lot is not open to the public and there are several fee-based parking facilities located in the immediate vicinity of the project site. Furthermore, the proposed project would construct a 29 space subterranean parking facility which shall be adequate for proposed use of property and shall comply with all City plans and policies pertaining to parking.</p> <p><b>Air Traffic:</b> No change in air traffic patterns would result from the proposed mixed-use project.</p>

Natural Features	Code	Source or Documentation
Water Resources	4	<p>As discussed in “Stormwater” above, discharge of stormwater runoff during construction shall require the use of best management practices. After implementation of mitigation measures, the project will avoid having an adverse effect on stormwater. Stormwater mitigation measures are included in the “Stormwater” section above.</p> <p>As discussed above in “Water Supply”, the Department of Water and Power has adequate water supplies to serve this mixed-use project, and the project would incorporate water conservation measures as described under “XV. Utilities (Local or Regional Water Supplies)”. The net increase of water usage would not result in an adverse effect.</p> <p>In addition, the proposed project would be designed, constructed and operated seeking a LEED Silver rating which would include a variety of water conservation measures such as low-flow toilets/faucets, single-pass cooling systems, among others.</p> <p>For a discussion of surface water, see “Surface</p>

<b>Natural Features</b>	<b>Code</b>	<b>Source or Documentation</b>
		Water,” below.
Surface Water	1	The project site does not contain a stream, river, lake or other body of water. The nearest body of water is the Los Angeles River located approximately 1.0 mile east of the project site. Given its distance as well as intervening urban developments, it is unlikely that the proposed project would result in any adverse effects to the Los Angeles River. The project will be required to control stormwater runoff using best management practices and mitigation measures described above under “Stormwater”. Implementation of the above described mitigation measures, would ensure that no adverse effects to surface water would occur resulting from the proposed project.
Unique Natural Features and Agricultural Lands	1	The project site is part of a fully urbanized area of the City of Los Angeles. The site is generally flat and does not contain any unique natural features or agricultural lands.
Vegetation and Wildlife	1	The project site is part of a densely developed urban area of the City of Los Angeles. The site does not contain any unique vegetation or wildlife.

<b>Other Factors</b>	<b>Code</b>	<b>Source or Documentation</b>
Flood Disaster Protection Act [Flood Insurance] [§58.6(a)]	1	The project site is not located within a 100-year or 500-year floodplain. The project site is located in Zone X as identified on the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM) Number 06037C1636F, effective September 26, 2008. Zone X refers to areas outside of the 0.2% annual chance floodplain and describes areas with a minimal risk of flood. The nearest flood zone is located approximately 1.0 mile east of the project site at the banks of the Los Angeles River, which is identified as a Flood Zone A. Zone A refers to areas subject to inundation by a 1% annual chance of flood. However, the Los Angeles River would not pose a risk of flooding to the project site due to its distant downslope location.
Coastal Barrier Resources Act/ Coastal Barrier Improvement Act [§58.6(c)]	1	The project does not involve activities on coastal barriers in the Coastal Barrier Resource System, as defined by The Coastal Barrier Resources Act of 1982 and the Coastal Barrier Improvement Act of 1990. These findings are based on a review of the

Other Factors	Code	Source or Documentation
		U.S. Fish and Wildlife Service website ( <a href="http://www.fws.gov/habitatconservation/coastal_barrier.html">http://www.fws.gov/habitatconservation/coastal_barrier.html</a> ).
Airport Runway Clear Zone or Clear Zone Disclosure [§58.6(d)]	1	No airports are located in the vicinity of the project site. Therefore, no Clear Zones apply to the site.
Other Factors	2	The project site is located within a fully developed urban area of Los Angeles. The proposed project would be consistent with the planning objectives for the site. The project is located in close proximity to existing transit service and freeways; is served by existing infrastructure; would provide housing, commercial services, and employment for the community's nearby residents; and would contribute towards a much needed supply of affordable housing options for very low- to low-income residents in the community.



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## SUMMARY OF FINDINGS AND CONCLUSIONS

With the inclusion of specified mitigation measures, the project is anticipated to have no adverse effect on the environment. Table 1 (Summary of Findings) summarizes the findings for each environmental factor.

**Table 1: Summary of Findings**

Environmental Factor	Project Impact
<ul style="list-style-type: none"> <li>• Environmental Design</li> <li>• Employment and Income Patterns</li> <li>• Social Services</li> <li>• Open Space and Recreation—Open Space</li> <li>• Other Factors</li> </ul>	Potentially beneficial
<ul style="list-style-type: none"> <li>• Erosion</li> <li>• Soil Suitability</li> <li>• Hazards and Nuisances including Site Safety</li> <li>• Noise</li> <li>• Air Quality</li> <li>• Educational Facilities</li> <li>• Solid Waste</li> <li>• Stormwater</li> <li>• Public Safety—Fire</li> <li>• Open Space and Recreation—Recreation</li> <li>• Open Space and Recreation—Cultural Facilities</li> <li>• Water Resources</li> </ul>	Requires mitigation
<ul style="list-style-type: none"> <li>• Conformance with Comprehensive Plans and Zoning</li> <li>• Compatibility and Urban Impact</li> <li>• Slope</li> <li>• Energy Consumption</li> <li>• Demographic Character Changes</li> <li>• Displacement</li> <li>• Commercial Facilities</li> <li>• Health Care</li> <li>• Waste Water</li> <li>• Water Supply</li> <li>• Public Safety---Police</li> <li>• Public Safety---Emergency Medical</li> </ul>	No impact

Environmental Factor	Project Impact
<ul style="list-style-type: none"> <li>• Transportation</li> <li>• Surface Water</li> <li>• Unique Natural Features and Agricultural Lands</li> <li>• Vegetation and Wildlife</li> <li>• Flood Disaster Protection Act</li> <li>• Coastal Barrier Resources Act/Coastal Barrier Improvement Act</li> <li>• Airport Runway Clear Zone or Clear Zone Disclosure</li> </ul>	

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## 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.)*

### No Action Alternative

*[24 CFR 58.40(e)] (Discuss the benefits and adverse impacts to the human environment of not implementing the preferred alternative).*

Absent the project, existing undeveloped conditions of the subject site would continue. The existing Genesis Hotel building would remain intact and vacant while the surface parking lot would continue to be used as a parking for New Genesis Apartments, L.P. employees. The community would not benefit from the project's provision of employment opportunities, commercial services, social and support services, community space and affordable housing. The adverse housing, as well as social service effects would continue. Benefits associated with modern buildings featuring landscaping and security enhancements would not occur. Absent the project, it is unknown when and if another proposal for the reuse of the site would be forthcoming.

### Low Intensity Alternative

This alternative considers reuse of the site with a similar mix of residential uses and commercial retail on the first floor to match surrounding developments. This alternative would place 70 to 106 affordable housing units across six stories featuring 3,100 square feet of commercial retail space, and a single-level subterranean parking garage containing 29 parking spaces. The development would also feature an approximately 5,400 square foot open space plaza at the center of the building, featuring community oriented amenities including landscaped open space, a community recreation room, and communal laundry facilities. The potential environmental effects associated with this alternative would be similar to those of the project. The current project design reflects design changes and modifications, particularly in regard to commercial space, due to engineering constraints and changes to the site plan orientation regarding the scope of the proposed development. Therefore, this alternative was modified to become what is now the proposed project due to these site plan changes.

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## **MITIGATION MEASURES RECOMMENDED**

*[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.)*

### **I. Aesthetics (Greater Downtown Housing Incentive Area)**

- Prior to issuance of a building permit, the Los Angeles Community Redevelopment Agency (CRA/LA) shall make a determination that the project complies with the Urban Design Standards and Guidelines.

### **II. Aesthetics (Landscaping)**

- All open areas not used for buildings, driveways, parking areas, recreation facilities or walks shall be attractively landscaped and maintained in accordance with a landscape plan, including an automatic irrigation plan, prepared by a licensed landscape architect.

### **III. Aesthetics (Graffiti)**

- Every building, structure, or portion thereof, shall be maintained in a safe and sanitary condition and good repair, and from graffiti, debris, rubbish, garbage, trash, overgrown vegetation or other similar material, pursuant to Municipal Code Section 91.8104.
- The exterior of all buildings and fences shall be kept free of graffiti.

### **IV. Aesthetics (Light)**

- Outdoor lighting shall be designed and installed with shielding, to direct light towards the ground.

### **V. Aesthetics (Glare)**

- The exterior of the proposed building shall be constructed of materials such as high-performance tinted non-reflective glass and pre-cast concrete or fabricated wall surfaces.

### **VI. Air Quality (Stationary)**

- An air filtration system shall be installed and maintained for both commercial and residential uses with filters meeting or exceeding the ASHRAE Standard 52.2 Minimum Efficiency Reporting Value (MERV) of 12, to the satisfaction of the Department of Building and Safety.

### **VII. Air Quality (Construction Period)**

- All unpaved demolition and construction areas shall be wetted at least twice daily during excavation and construction, and temporary dust covers shall be used to reduce dust emissions and meet SCAQMD District Rule 403. Wetting could reduce fugitive dust by as much as 50 percent.

- The owner or contractor shall keep the construction area sufficiently dampened to control dust caused by construction and hauling, and at all times provide reasonable control of dust caused by wind.
- All loads shall be secured by trimming, watering, or other appropriate means to prevent spillage and dust.
- All materials transported off site shall be either sufficiently watered or securely covered to prevent excessive amount of dust.
- All clearing, earth moving, or excavation activities shall be discontinued during periods of high wind (i.e., greater than 15 mph), so as to prevent excessive amounts of dust.
- General contractors shall maintain and operate construction equipment so as to minimize exhaust emissions.

### **VIII. Cultural Resources (Archaeological)**

- A professional archaeologist shall be retained to monitor any earth moving operations
- If cultural resources are encountered in the APE during construction, all work shall halt until the resources can be properly evaluated by a qualified professional archaeologist as outlined in Stipulation XII of the Programmatic Agreement of September 6, 1995 among the City of Los Angeles, the State Historic Preservation Officer, and the Advisory Council on Historic Preservation.
- Copies of the archaeological survey, study or report shall be submitted to the UCLA Archaeological Information Center.
- A covenant and agreement shall be recorded prior to obtaining a grading permit.

### **IX. Geology, Seismicity, and Soil**

- The design and construction of the project shall conform to the Uniform Building Code seismic standards as approved by the Department of Building and Safety.

### **X. Noise (Noise Attenuation)**

- Exterior walls shall be airtight. All joints shall be grouted or caulked airtight. At the penetration of exterior walls by pipes, ducts, or conduits, the space between the wall and pipes, ducts, or conduits shall be caulked or filled with mortar.
- Window assemblies shall have a sound transmission class (STC) rating of not less than 30.
- Insulation material shall be at least two inches thick and shall be installed continuously throughout the cavity space behind the exterior sheathing and between wall studs.
- The interior surface of the exterior walls shall be gypsum board or plaster at least ½ inch thick, installed on the studs. Continuous composition board, plywood, or gypsum board sheathing at least ½ inch thick shall cover the exterior side of the wall studs behind wood or metal siding. Asphaltic or wood shake shingles are acceptable in lieu of siding.
- The project sponsor shall comply with the Noise Insulation Standards of Title 24 of the California Code of Regulations, which insures an acceptable interior noise environment of 45 dB or lower.

## XI. Noise (Construction Period)

- The project shall comply with City of Los Angeles Noise Ordinance Nos. 144,331 and 161,574, and any subsequent ordinances, which prohibit the emission and creation of noise beyond certain levels at adjacent uses unless technically infeasible
- Construction and demolition shall be restricted to the hours of 7:00 a.m. to 6:00 p.m. Monday through Friday, and 8:00 a.m. to 6:00 p.m. on Saturday.
- Construction and demolition activities shall be scheduled so as to avoid operating several pieces of equipment simultaneously.
- The project contractor shall use power construction equipment with state-of-the-art noise shielding and muffling devices
- All mobile or fixed noise-producing equipment used on the project that is regulated for noise output by a local, state, or federal agency shall comply with such regulation while in the course of project activity.
- Electrically powered equipment instead of pneumatic or internal combustion powered equipment shall be used, where feasible.
- Material stockpiles and mobile equipment staging, parking, and maintenance areas shall be located as far as practicable from noise-sensitive receptors.
- Construction site and haul-road speed limits shall be established and enforced during the construction period.
- The hours of construction including noisy maintenance activities and all spoils and material transport shall be restricted to the periods and days permitted by the local noise or other applicable ordinance. The only exception to this mitigation should be inaudible underground tunneling or similar construction activity. Noise-producing project activity shall comply with local noise control regulations affecting construction activity or obtain exemptions therefrom.
- The use of noise-producing signals, including horns, whistles, alarms, and bells shall be for safety warning purposes only.
- No project-related public address or music system shall be audible at any adjacent receptor.
- The onsite construction supervisor shall have the responsibility and authority to receive and resolve noise complaints. A clear appeal process to the Owner shall be established prior to construction commencement that will allow for resolution of noise problems that cannot be immediately solved by the site supervisor.
- The contractor shall develop a project noise control plan, which shall have been approved and implemented prior to commencement of any construction activity.
- Noise control features and plans shall be reviewed and approved by a noise control engineering professional.
- Contract incentives may be offered to the construction contractor to minimize or eliminate noise complaints resulting from project activities where project construction would result in significant noise impacts.
- The emplacement of berms or erection of temporary soundwall barriers shall be considered where project activity is unavoidably close to noise-sensitive receptors.
- Planting of trees and shrubbery while useful for visual screening is not an effective noise control mechanism and is not considered a noise control or mitigation measure for noise impacts.

**XII. Noise (Rooftop Mechanical Equipment)**

- The applicant shall incorporate noise attenuating methods and devices to limit increased noise resulting from rooftop mechanical equipment, to no greater than a 3 decibel (dB) CNEL increase as measured at the property line.

**XIII. Erosion and Grading**

- Excavation and grading activities shall be scheduled during dry weather periods. If grading occurs during the rainy season (October 15 through April 1), diversion dikes shall be constructed to channel runoff around the site. Channels shall be lined with grass or roughened pavement to reduce velocity.
- Appropriate erosion control and drainage devices shall be provided to the satisfaction of the Building and Safety Department. These measures include interceptor terraces, berms, vee-channels, and inlet and outlet structures, as specified by Section 91.7013 of the Building Code, including planting fast-growing annual and perennial grasses in areas where construction is not immediately planned.
- Stockpiles and excavated soil shall be covered with secured tarps or plastic sheeting.

**XIV. Hazardous Materials or Waste (Construction Period)**

- All waste shall be disposed of properly. Appropriately labeled recycling bins to recycle construction materials including: solvents, water-based paints, vehicle fluids, broken asphalt and concrete; wood, and vegetation shall be used. Non recyclable materials/wastes shall be taken to an appropriate landfill. Toxic wastes shall be discarded at a licensed regulated disposal site.
- Leaks, drips and spills shall be cleaned up immediately to prevent contaminated soil on paved surfaces that can be washed into storm drains.
- Pavement shall not be hosed down at material spills. Dry cleanup methods shall be used whenever possible.
- Dumpsters shall be covered and maintained. Uncovered dumpsters shall be placed under a roof or cover with tarps or plastic sheeting.
- Where truck traffic is frequent, gravel approaches shall be used to reduce soil compaction and limit the tracking of sediment into local streets and roadways.
- All vehicle/equipment maintenance, repair, and washing shall be conducted away from storm drains. All major repairs shall be conducted off-site. Drip pans or drop clothes shall be used to catch drips and spills.

**XV. Hazardous Materials or Waste (Lead-Based Paint)**

- All removal of lead-based paint and/or lead hazards be completed in accordance with the following regulations:
  - Title 17, California Code of Regulations, Division 1, Chapter 8: Accreditation, Certification and Work Practices for Lead-Based Paint and Lead Hazards.
  - Title 8, California Code of Regulations, Section 1532.1: Cal/OSHA Construction Safety Orders, Lead.

- “Guidelines for the Evaluation and Control of Lead-Based Paint Hazards in Housing,” US Department of Housing and Urban Development, June 1995.
- All waste generated from any lead related work must be properly profiled and disposed of. Waste manifests documenting the disposal site shall be submitted at the end of each phase of the job.
- All future renovation, demolition, construction or abatement activities with the potential for disturbing identified ACM or LBP, be performed by properly trained and qualified personnel. Certain interim measures shall be considered in cases where abatement is not immediately feasible or possible. These measures shall be addressed through the initiation of a formal Operations and Maintenance Program.

## **XVI. Pedestrian and Vehicular Safety**

- The developer shall install appropriate traffic signs around the site to ensure pedestrian and vehicle safety.
- Fences shall be constructed around the site to minimize trespassing, vandalism, short-cut attractions and attractive nuisances.
- The applicant shall submit a parking and driveway plan that incorporates design features that reduce accidents, to the Bureau of Engineering and the Department of Transportation for approval.

## **XVII. Greenhouse Gas Emissions**

- Construction of the building shall exceed Title 24 minimum requirements for insulation of walls, ceilings, and fenestration, to the satisfaction of the Department of Building and Safety.
- Only low-and non-volatile organic compound (VOC) containing paints, sealants, and adhesives shall be utilized in the construction and maintenance of the building.

## **XVIII. Fire Services**

The following recommendations of the Fire Department relative to fire safety shall be incorporated into the building plans:

- A plot plan shall be submitted for approval by the Fire Department either prior to the recordation of a final map or the approval of a building permit.
- The plot plan shall include the following minimum design features:
  - fire lanes, where required, shall be a minimum of 20 feet in width;
  - all structures must be within 300 feet of an approved fire hydrant; and
  - entrances to any dwelling unit or guest room shall not be more than 150 feet in distance in horizontal travel from the edge of the roadway of an improved street or approved fire lane.

## **XIX. Police Services**



- The plans shall incorporate the design guidelines relative to security, semi-public and private spaces, which may include but is not limited to access control to building, secured parking facilities, walls/fences with key systems, well-illuminated public and semi-public space designed with a minimum of dead space to eliminate areas of concealment, location of toilet facilities or building entrances in high-foot traffic areas, and provision of security guard patrol throughout the project site if needed and other measures as outlined in *Design Out Crime Guidelines: Crime Prevention Through Environmental Design* published by the Los Angeles Police Department's Crime Prevention Section. These measures shall be approved by the Police Department prior to the issuance of building permits.

## **XX. School Services**

- The applicant shall pay school fees to the Los Angeles Unified School District to offset the impact of additional student enrollment at schools serving the project area.

## **XXI. Recreation**

- Per Section 17.12-A of the LA Municipal Code, the owner/developer shall pay the applicable Quimby fees for the construction of condominiums, or Recreation and Park fees for construction of apartment buildings.

## **XXII. Street Improvements**

- The project shall comply with the Bureau of Engineering's requirements for street dedications and improvements that will reduce traffic impacts in direct proportion to those caused by the proposed project.

## **XXIII. Stormwater Runoff Management / Surface Water**

Ordinance Nos. 172,176 and 173,494 specify Stormwater and Urban Runoff Pollution Control, which requires the application of Best Management Practices (BMPs). Chapter IX, Division 70 of the Los Angeles Municipal Code addresses grading, excavations, and fills. Applicants shall meet the requirements of the Standard Urban Stormwater Mitigation Plan (SUSMP) approved by Los Angeles Regional Water Quality Control Board, including the following (a copy of the SUSMP can be downloaded at <http://www.swrcb.ca.gov/rwqcb4/>):

- Project applicant shall implement stormwater BMPs to treat and infiltrate the runoff from a storm event producing  $\frac{3}{4}$  inch of rainfall in a 24-hour period. The design of structural BMPs shall be in accordance with the *Development Best Management Practices Handbook*, Part B Planning Activities. A signed certificate from a California licensed civil engineer or licensed architect that the proposed BMPs meet this numerical threshold standard is required.
- Post development peak stormwater runoff discharge rates shall not exceed the estimated pre-development rate for developments where the increased peak stormwater discharge rate will result in increased potential for downstream erosion.
- Trees and other vegetation shall be maximized at each site by planting additional vegetation, clustering tree areas, and promoting the use of native and/or drought tolerant plants.

- Any connection to the sanitary sewer shall have authorization from the Bureau of Sanitation.
- Impervious surface area shall be reduced by using permeable pavement materials where appropriate, including: pervious concrete/asphalt; unit pavers, i.e., turf block; and granular materials, i.e., crushed aggregates, cobbles.
- Roof runoff systems shall be installed where site is suitable for installation. Runoff from rooftops is relatively clean, can provide groundwater recharge, and reduce excess runoff into storm drains.
- Messages shall be painted adjacent to storm drain inlets that prohibit the dumping of improper materials into the storm drain system. Prefabricated stencils can be obtained from the Department of Public Works, Stormwater Management Division.
- All storm drain inlets and catch basins within the project area shall be stenciled with prohibitive language (such as NO DUMPING—DRAINS TO OCEAN) and/or graphical icons to discourage illegal dumping.
- Signs and prohibitive language and/or graphical icons, which prohibit illegal dumping, shall be posted at public access points along channels and creeks within the project area.
- Legibility of stencils and signs shall be maintained.
- Materials with the potential to contaminate stormwater must be: (a) placed in an enclosure such as, but not limited to, a cabinet, shed, or similar stormwater conveyance system; or (b) protected by secondary containment structures such as berms, dikes, or curbs. The storage area must be paved and sufficiently impervious and must be sheltered by a roof or awning to minimize collection of stormwater within the secondary containment area.
- An efficient irrigation system shall be designed to minimize runoff including: drip irrigation for shrubs to limit excessive spray, shutoff devices to prevent irrigation after significant precipitation, and flow reducers.
- The owner(s) of the property shall prepare and execute a covenant and agreement (Planning Department General form CP-6770) satisfactory to the Planning Department binding the owners to post-construction maintenance on the structural BMPs in accordance with the Standard Urban Stormwater Mitigation Plan and/or per manufacturer's instructions.

#### **XXIV. Utilities (Local or Regional Water Supplies)**

- The project shall comply with Ordinance No. 170,978 (Water Management), which imposes water conservation measures in landscape, installation, and maintenance (e.g., use drip irrigation and soak hoses in lieu of sprinklers to lower the amount of water lost to evaporation and overspray, set automatic sprinkler systems to irrigate during the early morning or evening hours to minimize water loss due to evaporation, and water less in the cooler months and during the rainy season).
- **All New Construction, Commercial/Industrial Remodel, Condominium Conversions, and Adaptive Reuse**

Unless otherwise required, and to the satisfaction of the Department of Building and Safety, the applicant shall install:

- c. High-efficiency toilets (maximum 1.28 gpf), including dual-flush water closets, and high-efficiency urinals (maximum 0.5 gpf), including no-flush or waterless urinals, in all restrooms

- as appropriate. Rebates may be offered through the Los Angeles Department of Water and Power to offset portions of the costs of these installations.
- d. Restroom faucets with a maximum flow rate of 1.5 gallons per minute. Single-pass cooling equipment shall be strictly prohibited from use. Prohibition of such equipment shall be indicated on the building plans and incorporated into tenant lease agreements. (Single-pass cooling refers to the use of potable water to extract heat from process equipment—e.g., vacuum pump, ice machines—by passing the water through equipment and discharging the heated water to the sanitary wastewater system.)
- **All New Commercial and Industrial**  
Unless otherwise required, all restroom faucets shall be of a self-closing design, to the satisfaction of the Department of Building and Safety.
  - **All New Residential, Condominium Conversions, and Adaptive Reuse**  
Unless otherwise required, and to the satisfaction of the Department of Building and Safety, the applicant shall:
    - a. Install a demand (tankless or instantaneous) water heater system sufficient to serve the anticipated needs of the dwellings.
    - b. Install no more than one showerhead per shower stall, having a flow rate no greater than 2.0 gallons per minute.
    - c. Install and utilize only high-efficiency clothes washers (water factor of 6.0 or less) in the project, if proposed to be provided in either individual units and/or in a common laundry room(s). If such appliance is to be furnished by a tenant, this requirement shall be incorporated into the lease agreement, and the applicant shall be responsible for ensuring compliance. Rebates may be offered through the Los Angeles Department of Water and Power to offset portions of the costs associated with installation.
    - d. Install and utilize only high-efficiency Energy Star-rated dishwashers in the project, if proposed to be provided. If such appliance is to be furnished by a tenant, this requirement shall be incorporated in the lease agreement, and the applicant shall be responsible for ensuring compliance.
  - **Landscaping**  
In addition to the requirements of the Landscape Ordinance, the landscape plan shall incorporate the following:
    - h. Weather-based irrigation controller with rain shutoff
    - i. Matched precipitation (flow) rates for sprinkler heads
    - j. Drip/microspray/subsurface irrigation where appropriate
    - k. Minimum irrigation system distribution uniformity of 75 percent
    - l. Proper hydro-zoning, turf minimization and use of native/drought tolerant plant materials
    - m. Use of landscape contouring to minimize precipitation runoff
    - n. A separate water meter (or submeter), flow sensor, and master valve shutoff shall be installed for irrigated landscape areas totaling 5,000 sf. and greater, to the satisfaction of the Department of Building and Safety

## XXV. Utilities (Solid Waste)

- Recycling bins shall be provided at appropriate locations to promote recycling of paper, metal, glass, and other recyclable material. These bins shall be emptied and recycled accordingly as a part of the project's regular solid waste disposal program.
- Prior to the issuance of any demolition or construction permit, the applicant shall provide a copy of the receipt or contract from a waste disposal company providing services to the project, specifying recycled waste service(s), to the satisfaction of the Department of Building and Safety. The demolition and construction contractor(s) shall only contract for waste disposal services with a company that recycles demolition and/or construction-related wastes.
- To facilitate onsite separation and recycling of demolition and construction-related wastes, the contractor(s) shall provide temporary waste separation bins onsite during demolition and construction. These bins shall be emptied and recycled accordingly as part of the project's regular solid waste disposal program.

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## ADDITIONAL STUDIES PERFORMED

- CEQA Initial Study Checklist and Mitigated Negative Declaration for Environmental Case ENV-2008-1744-MND, Case No. DIR-2008-1743-SPR. Prepared by City of Los Angeles, Planning Department. July 2008. Provided in Appendix A.
- Section 106 Review for 452-458 S. Main Street- Genesis Hotel, Los Angeles, CA. Jones & Stokes Associates. Prepared by Christopher J. Hetzel. December 2007. Provided in Appendix B.
- Air Quality Memorandum with Emissions Calculations and Analysis for URBEMIS Model. ICF Jones & Stokes. Prepared by Victor Ortiz. December 2009. Provided in Appendix E.
- Phase I Environmental Site Assessment 452-458 South Main Street, Los Angeles, California, 90013. Prepared for Skid Row Housing Trust, Los Angeles, California. October, 2007. Prepared by Pacific Environmental. Provided in Appendix F.
- Asbestos and Lead Based Paint Investigation for 452-458 South Main Street, Los Angeles, California, 90013. Prepared for Skid Row Housing Trust, Los Angeles, California. August, 2007. Prepared by Pacific Environmental. Provided in Appendix F.
- Site Plan Review for New Genesis Apartments/452-458 Main Street, Los Angeles, CA, 90013. Case No. DIR 2008-1743-SPR. Prepared for Skid Row Housing Trust, Los Angeles, California. July 2008. Prepared by City of Los Angeles Department of City Planning. Attached Traffic Analysis prepared by Weston Pringle. Provided in Appendix G.
- Geotechnical Investigation for Proposed Multi-Family Residential Development, 458 South Main Street, Los Angeles, California. Prepared for Skid Row Housing Trust, Los Angeles, California. October 2007. Prepared by GEOCON Inland Empire, Inc. Provided in Appendix H.

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## LIST OF SOURCES, AGENCIES, AND PERSONS CONSULTED

[40 CFR 1508.9(b)]

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- <http://www.amlegal.com/nxt/gateway.dll/California/lapz/municipalcodechapteriplanningandzonin gco/chapterigeneralprovisionsandzoning/article2specificplanning>. Accessed: December 18, 2009.
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**Completing Tier II (Site-Specific) Environmental Reviews for  
Projects Associated with the Michigan NSP2 Consortium  
Tiered Environmental Assessment**

This Tier II review may only be used for those projects that are associated with the *Tier I Environmental Assessment for Michigan NSP2 Consortium Program* that was approved by the Michigan State Housing Development Authority (MSHDA) in February 2010 and the Supplemental Environmental Assessment approved in March 2012. Activities that involve the following should be reviewed with MSHDA prior to proceeding with the Tier II for a determination as to whether or not a separate environmental assessment may be necessary:

- Rehab or new construction projects involving non-residential end use (mixed use),
- Change in land use, and/or
- Increase in residential density.

A Tier II review must be completed for each project receiving NSP2 grant funds. A copy of the form is attached, as well as “Instructions on the Documentation Required for Tier II (Site Specific) Review Findings.” Project funds (both NSP2 funds as well as non-HUD funds) may not be committed or spent prior to completion of the Tier II review.

Once the Tier II form is completed and all required supporting documentation is obtained and attached, MSHDA will certify that compliance with 24 CFR Part 58 has been achieved. No public notification or approval from HUD is required. Project funds may be committed and spent once MSHDA’s approval is secured. All documentation must then be included and retained in the subrecipient’s ERR and a copy forwarded to MSHDA.

If there are any questions regarding appropriate use of the Tier II review form, completion of the form, required supporting documentation, or anything else pertaining to the environmental review, please contact Carolyn Cunningham in the Office of Community Development, (517) 353-4661 or E-mail: [cunninghamc@michigan.gov](mailto:cunninghamc@michigan.gov), or Michael Vollick in the Office of Rental Development, (313) 456-2596 or E-mail: [vollickm2@michigan.gov](mailto:vollickm2@michigan.gov).

**Tier II (Site Specific) Environmental Review for  
Projects Associated with the Michigan NSP2 Consortium  
Tiered Environmental Assessment**

*This form is to be used ONLY for NSP2 projects funded through the Michigan NSP2 Consortium Program. Completion of this site-specific clearance constitutes Tier II of the Tier I Environmental Assessment for the Michigan NSP2 Consortium Program that was approved in February 2010 and the Supplemental Environmental Assessment approved in March 2012. All outstanding environmental compliance requirements that could not be resolved by the target area (Tier I) review must be resolved now by completing this Tier II Review. The completed form must be signed by the preparer and approved with the signature of the "Authorized Approving Official". No public notification or further approval from HUD is required; and project funds may be committed and spent. A copy of the completed Checklist and all supporting documentation must be retained in the project file.*

Consortium Partner: Highland Park

Grant #:

Project Address(es) and Census Tract (include a map of the project location): See below for property list.

**Project Description** (please include a map with the location of the properties and all related activities e.g., on-site or off-site sewer and water lines, access roads, regardless of whether NSP2 funds would be used in whole or in part for the project):

According to U.S. Census Bureau data, the City of Highland Park has experienced nearly a thirty percent decrease in population during the years 2000 to 2010, resulting in city-wide vacancies of residential properties. In an effort to stabilize and consolidate neighborhoods, the City has identified 33 vacant single-family residential properties and 11 multifamily residential properties as being candidates for demolition utilizing funding provided through the Department of Housing and Urban Development Neighborhood Stabilization Program (NSP). At the current time, the City has no plans to redevelop these properties for the future. If a time comes in which the properties were to be redeveloped an additional environmental review would be appropriate.

Highland Park Property Addresses:

Single Family Homes

48 Candler	228 Ferris	372 Highland
69 Sturtevant	99 Grove	370 Highland
112 Ferris	250 Ferris	400 Highland
123 Candler	287 Highland	47 Grove
125 Louis	307 Cortland	85 Grove
15828 Joslyn	323 Pasadena	41 Kendall
15832 Joslyn	335 Pasadena	
220 Ferris	341 Highland	

Multifamily Homes

104-106 Church	92 Kendall
358 Cortland	258-260 Pilgrim
359-361 Cortland	316 Richton
38 E McNichols	49-51 Stevens
356 Elmhurst	132-143 Stevens
364 Elmhurst	

**Source Documentation:**

**Appendix A:** Map of Demolition Projects in Highland Park

U.S. Census Data – Highland Park <http://quickfacts.census.gov/qfd/states/26/2638180.html>

**COMPLIANCE FINDING AND SUPPORTING DOCUMENTATION**

For the following environmental compliance requirements, please check box for the appropriate finding statement and provide a copy of the requested documentation to support the finding being made [Refer to the *Instructions on the Documentation Required for Tier II (Site Specific) Review Findings* attached to this form.]

**HISTORIC PRESERVATION** [Copies of all documents related to the finding selected below must be retained in the project environmental review record (ERR.)] A historic property is defined as a property included in or eligible for inclusion in the National Register of Historic Places.

( X ) No historic properties will be affected (including “no effect” determination).

The State Historic Preservation Officer (SHPO) laid out the historic districts of Highland Park in a letter to the City dated July 12, 2010. According to this letter the historic districts are as follows: the Palmer Park Boulevard Apartment Buildings Historic District, located on the south side of W. McNichols Road between Rosa Parks Boulevard and Log Cabin Street; Medbury’s Grove Lawn District and an expansion area eligible for listing on the National Register bounded by Louise Street, Woodward Avenue, Puritan Street, and Harrison Avenue; and the Ford Plant district bounded by Oakland, Manchester, and Woodward Avenue. Additionally, the SHPO asked that additional consultation occur for rehabilitation or demolition projects that involve properties fifty years or older or any property not classified as a single-family residential structure. The SHPO concluded by stating that any structure originally built as a single-family residence but having since been divided into a multi-family residential structure should be treated as a single-family residential structure for the purpose of determining whether or not further SHPO consultation is required.

**Source Documentation:**

**Appendix B-1:** July 2010 Letter from State Historic Preservation Officer to the City of Highland Park

**Appendix B-2:** June 2012 Finding of No Historic Properties Affected for multifamily residential units

**EITHER** the project is limited to:

- 1) Acquisition of property with no plans for demolition, rehabilitation, or new construction;
- 2) Rehabilitation of buildings less than 50 years old (built after 1960);
- 3) Certain rehabilitation activities specifically listed in the 2010 SHPO letter for any type of building that is not on the list of historic properties or located within the historic districts provided by SHPO;
- 4) Demolition or rehabilitation of single family residences not on the list of historic properties or within the historic districts provided by the SHPO;

**OR** 5) SHPO has concurred with the determination that either there are no historic properties present or they are present but the project will have no effect upon them.

( ) No adverse effect on historic properties.

- 1) SHPO has concurred with the finding that the proposed rehabilitation of a historic property meets the Secretary’s Standards for Rehabilitation (36 CFR Section 67.7);
- 2) SHPO has concurred with a proposed finding of “no adverse effect”; or
- 3) SHPO has provided conditions that, if met, would result in a finding of “no adverse effect.”

( ) Adverse effect.

SHPO has concurred with a finding of “adverse effect on historic properties” and a Memorandum of Agreement has been executed to resolve the adverse effect(s).

**FLOODPLAIN MANAGEMENT** [Copies of all documents related to the finding selected below must be retained in the project environmental review record (ERR).]

( **X** ) Not within a special flood hazard area designated by FEMA (i.e., Zone A or V)

According to the Federal Emergency Management Agency’s Flood Insurance Rate Maps (FIRM) ID 26163C0125E dated February 2, 2012, there are no special flood hazard areas within the target project area. Therefore, the 33 proposed projects listed above would be excluded from the Executive Order 11988 8-step review process and would not be adversely impacted by floodplains.

**Source Documentation:**

**Appendix C-1:** FEMA Flood Rate Insurance Maps ID 26163C0125E dated February 2, 2012

**Appendix C-2:** Google Earth image with FEMA Floodplain data overlay

( ) Is within a special flood hazard area designated by FEMA, but is not an activity that is subject to completion of the 8 step decision making process (24 CFR 55.12)

( ) The 8 step decision making process was completed and there is no practicable alternative to locating the project in a special flood hazard area designated by FEMA.

( ) The 8 step decision making process confirms there is a practicable alternative to locating the project in a special flood hazard area designated by FEMA. Therefore, the community is withdrawing this project site from further consideration for NSP2 funding.

**COASTAL ZONE MANAGEMENT** [Copies of all documents related to the finding selected below must be retained in the project environmental review record (ERR)]

1. Is the project located in Berrien or Wayne Counties?

( ) No; project is not located in Berrien or Wayne Counties. The review of this factor is completed.

( **X** ) Yes; continue

( **X** ) The project is not located within a Coastal Zone Management Area of Berrien or Wayne Counties.

According to the Michigan Department of Environmental Quality, there are no Coastal Zone Management Boundaries or Areas within or adjacent to the project target area. Therefore, the proposed projects would have no adverse impacts on the Coastal Zone Management Boundaries and Areas of Wayne County.

**Source Documentation:**

**Appendix D -** Wayne County, Grosse Point Township, Grosse Point Woods, Grosse Point Farms, Grosse Point, Grosse Point Park, and Detroit Coastal Zone Management Boundary and Coastal Zone Management Area map.

( ) The project is located within a Coastal Zone Management Area and is consistent with the State Coastal Zone Management Plan.

( ) The project is not consistent with the State CZM Plan and requires mitigation.

**CLEAN AIR ACT** [Copies of all documents related to the finding selected below must be retained in the project environmental review record (ERR).]

( ) The proposed action is not of a type that would contribute air pollution.



( ) The project is within an area that is in *attainment* of the National Ambient Air Quality Standards (NAAQS).

( X ) The project is within an area in *nonattainment* with one or more of NAAQS, but it is in conformance with the Michigan State Implementation Plan (SIP).

The U.S. EPA National Ambient Air Quality Standards (NAAQS) map shows that Wayne County is in non-compliance with the NAAQS for particulate matter less than 2.5 microns in diameter (PM<sub>2.5</sub>). On April 25, 2011 Michigan Department of Environmental Quality (MDEQ) Air Quality Division submitted a re-determination request to EPA stating that Southeast Michigan is in attainment with PM<sub>2.5</sub>. MDEQ air quality monitoring data collected during the years 2007-2010 shows that all 7 counties in Southeast Michigan are in attainment for annual and 24 hour PM<sub>2.5</sub>. The original State Implementation Plan Submittal for PM<sub>2.5</sub> listed the areas of Wayne County where air quality monitors were reporting non-attainment for PM<sub>2.5</sub>. These air quality monitors were located in the southern part of Wayne County approximately 4 miles from the edge of the NSP2 target area.

Additionally, the proposed action consists of demolition, which will likely result in an increase of localized airborne particulate matter. However, due to the short-term and finite nature of demolition activities, it is unlikely that the proposed actions would cause any additional long-term air quality impacts in the area.

**Source Documentation:**

**Appendix E-1:** Map of Non-attainment areas in Michigan

**Appendix E-2:** Excerpt from Michigan State Implementation Plan illustrating locations of air quality monitors in relation to the NSP2 project area

**Appendix E-3:** Google Earth image of distances between Highland Park and area of Wayne County in non-attainment status for PM<sub>2</sub>

**Appendix E-4:** State Implementation Plan Submittal for PM 2.5 and Request for Re-Designation of attainment status

Michigan Department of Environmental Quality. 2011. State Implementation Plan Submittal for PM 2.5 and Request for Re-Designation of attainment status. Available online at:

[http://www.michigan.gov/documents/deq/deq-aqd-draft-SE-redesignation\\_pm2.5v9\\_350980\\_7.pdf](http://www.michigan.gov/documents/deq/deq-aqd-draft-SE-redesignation_pm2.5v9_350980_7.pdf)

( ) The project is within a *nonattainment* area and mitigation measures will be incorporated to bring the project into conformance with the SIP.

*If removal of regulated asbestos containing materials (RACM) is involved, respond to the following statements and provide documentation to support the finding being made:*

( ) Regulated asbestos containing materials (RACM) are present but the project does not meet the definition of a “facility” or “installation”, according to 40 CFR Part 61, Subpart M (National Emission Standard for Asbestos).

( ) RACMs are present and consultation was completed with the State or local air quality management district or commission about the required mitigation measures and procedures.

**NOISE ABATEMENT AND CONTROL** [Copies of all documents related to the finding selected below must be retained in the project environmental review record (ERR).]

( ) The proposed action **is not** within 1000 feet of a major roadway, 3,000 feet of a railroad, or 15 miles of a military or FAA-regulated civil airfield.

( X ) The proposed action is not a “noise sensitive land development” [24 CFR 51.101(a)(2)].

The proposed actions consist only of demolition, which does not meet HUD’s criteria of a “noise sensitive land development” according to 24 CFR §51.101 (a) (2). The regulation applies only to construction and rehabilitation with the exception of restoring existing structures to pre-disaster condition. The end use for the proposed properties does not include activities designed for re-inhabitation of the project locations. However, if at any time in the future the area is redeveloped for human inhabitation a noise assessment should be conducted. Additionally, any noise resulting from the demolition process should conform to local noise ordinances including adhering to normal construction hours (Municipal Code 1270.03B, states construction can only take place between the hours of 7:00 AM to 7:00 PM).

- Noise generated by the subject noise source(s) is *Acceptable* ( $\leq$  65 DNL).
- Noise generated by the subject noise source(s) is *Normally Unacceptable* (66 – 75 DNL), but there is an effective noise barrier present.
- Noise generated by the subject noise source(s) is *Normally Unacceptable* and noise attenuation is required.
- Noise generated by the subject noise sources is *Unacceptable* ( $>$  75 DNL).

**AIRPORT CLEAR ZONES** [Copies of all documents related to the finding selected below must be retained in the project environmental review record (ERR).]

- This regulation does not apply to this activity, according to 24 CFR 51.302.
- There aren’t any FAA-regulated airports within 2,500 feet and/or Dept. of Defense airfields within 15,000 feet (about 2.8 miles) of the proposed project.

There are no FAA-regulated airports within 2,500 feet nor military airfields within 15,000 feet of the proposed properties. The closest FAA regulated airport to the City of Highland Park is the Detroit City Airport (DET), which is over 15,500 feet to the nearest City limit.

**Source Documentation:**

Appendix F: Google Earth Map illustrating distance from the Detroit City Airport to the target project area.

- The proposed action is not located within a Runway Protection Zone, Clear Zone, or Accident Potential Zone.
- Acquisition and demolition is proposed in a Runway Protection Zone, Clear Zone, or Accident Potential Zone.

**HAZARDOUS OPERATIONS (ABOVEGROUND STORAGE TANKS)** [Copies of all documents related to the finding selected below must be retained in the project environmental review record (ERR).]

- The proposed action does not meet the definition of a “HUD assisted project” (§ 51.201).

The project description consists only of demolition, which according to 24 CFR § 51.201, does not meet the definition of a “HUD assisted project.” According to the regulation, HUD assisted projects are “...*the development, construction, rehabilitation, modernization or conversion with HUD subsidy, grant assistance, loan, loan guarantee, or mortgage insurance, of any project which is intended for residential, institutional, recreational, commercial or industrial use.*”[24 CFR § 51.201]

**Source Documentation**

Electronic Code of Federal Regulations. Government Printing Office database.

<http://ecfr.gpoaccess.gov/cgi/t/text/text-idx?c=ecfr&sid=432a64604925e4e6b54da7350f643352&rgn=div8&view=text&node=24:1.1.1.1.30.3.71.2&idno=24>. Accessed on April 4, 2012.

- ( ) There are no aboveground tanks are within one mile of the project site.
- ( ) There is a tank(s) within one mile but there is an effective barrier.
- ( ) There is a tank(s) within one mile but there is an acceptable separation distance between the tank(s) and people and buildings.
- ( ) The tank(s) is not an acceptable separation distance, and mitigation measures have been designed to protect people and buildings.

**TOXIC SUBSTANCES AND RADIOACTIVE MATERIALS** [Copies of all documents related to the finding selected below must be retained in the project environmental review record (ERR.)]

- (  ) There is no contamination on or near the site that would present a health hazard to occupants of the project or conflict with the intended use of the property.

An assessment of contaminated sites was conducted for the 33 NSP2 property demolition projects. Because the proposed action is demolition with no new construction, and the end use for all properties is open space, the risk of human health impacts exists primarily to the workers at the NSP2 properties at the time of demolition. Worker health and safety should be a top priority for project coordinators and care should be taken to ensure worker safety. Due to the short-term duration of the proposed activities and the low exposure risk associated with demolition, no on-site or intrusive toxic assessments were made. Instead, property locations were cross checked with a series of databases to clear those that require no further analysis and identify those that will be in need of further assessment (a Phase I, and if necessary Phase II, Environmental Site Assessment.)

The databases of toxic sites used in this assessment include the following:

The EPA CERCLIS database that contains information on hazardous waste sites, potentially hazardous waste sites and remedial activities across the nation, including those that are on the National Priorities List. The National Database, available online at <http://www.epa.gov/superfund/sites/cursites/>, listed three active and archived sites in Highland Park. Since Highland Park shares its borders with two other heavily urbanized areas: Hamtramck and Detroit, the CERCLIS sites for those cities were mapped as well to ensure none of the NSP2 properties located near the City borders would be in close proximity to a CERCLIS site in either neighboring city. Through this exercise a total of 6 CERCLIS sites were identified in and around the City of Highland Park. These sites were mapped using Google Earth to assess their proximity to the 33 NSP2 properties. No CERCLIS sites were found to be adjacent to any of the NSP2 properties.

The Michigan Department of Environmental Quality Storage Tank Information database listing open leaking underground storage tanks (LUST) in the City of Highland Park as regulated through Natural Resources and Environmental Protection Act, 1994 PA 451 part 213 was used to assess potential risk of toxic materials migrating onto the NSP2 properties. According to the database there are currently 36 active LUST sites in the City of Highland Park. These sites, as well as any found in neighboring cities (Hamtramck and Detroit) close to the City border were mapped using Google Earth. Any properties found to be in close proximity to the LUST database sites were removed from this Tier II environmental review. The projects removed from this review (listed below in Table 1) should undergo a separate Phase I, and if necessary Phase II,

Environmental Site Assessment to accurately analyze the risk of toxic contamination at the NSP2 property. Because open space is the end use of these properties, only properties found adjacent to the open LUST sites were removed from the list of properties covered under this Tier II. Workers are advised to alert project coordinators if any visible contamination, vapors or smells are detected during the demolition process in addition to completing release notification requirements under State of Michigan and federal authorities.

**Table 1:** Properties within close proximity to a leaking underground storage tank

<b>NSP2 Property</b>	<b>Contamination Issue</b>	<b>Name and Location of MDEQ Facility</b>	<b>Substance</b>	<b>Distance from MDEQ Facility to NSP2 Property</b>
1 Hill	Leaking Underground Storage Tank	McNichols Petroleum, 820 W McNichols Rd, Detroit.	Gasoline	204 feet
38 E. McNichols	Leaking Underground Storage Tank	Woodward & Six Mile Food Mart, 16540 Woodward Avenue	Gasoline, Diesel	356 feet
38 E. McNichols	Leaking Underground Storage Tank	Nassar Investment Corp, One E McNichols, Detroit, MI	Unknown	273 feet
49 Stevens	Leaking Underground Storage Tank	Woodward & Six Mile Food Mart, 16540 Woodward Avenue	Gasoline, Diesel	356 feet
51 Stevens	Leaking Underground Storage Tank	Woodward & Six Mile Food Mart, 16540 Woodward Avenue	Gasoline, Diesel	349 feet
49 Stevens	Leaking Underground Storage Tank	Bill Snethkamp Chrysler-plymouth, 16400 Woodward Avenue	Oil and Hydraulic Oil	386 feet
51 Stevens	Leaking Underground Storage Tank	Bill Snethkamp Chrysler-plymouth, 16400 Woodward Avenue	Oil and Hydraulic Oil	386 feet
244 Church	Leaking Underground Storage Tank	M & H Service Station, 16251 Oakland St	Gasoline	91 feet

The Michigan DEQ Natural Resources and Environmental Protection Act, 1994 PA 451 part 201 database tracks releases of hazardous substances in excess of the Part 201 residential criteria, and/or where corrective actions have not been completed under Part 201 to meet the applicable cleanup criteria. The database identified 8 sites in the City of Highland Park. Only 3 sites were identified as being potentially problematic due to their status being listed as either: evaluation conducted, inactive- no actions taken to address, interim response in progress, and remedial actions were mapped and analyzed. The sites identified (Witco located at 364 Midland Avenue, M & G Convoy Property located at 15100 Oakland Avenue, and an unnamed property located at 385 Midland) were at least 0.25 miles away from the nearest NSP2 property. Additionally, a search was conducted to ensure there were no Part 201 sites found near the border of Highland Park and the surrounding cities of Hamtramck and Detroit. The closest Part 201 site outside of Highland Park, was the Canflow International Detroit site located at 615 E Greendale, Detroit and approximately 0.65 miles from the Highland Park NSP2 target area.

Additionally, internet searches were conducted to find any other potential contamination at or near the NSP2 properties. In 2008, the Michigan Department of Environmental Quality Remediation and Redevelopment Division conducted a study on 10 former lead smelter sites in Wayne County. Given the direction of the prevailing winds (blowing northeast from the smelters) as well as the proximity to the NSP2 census tracts, three former lead smelters were identified as potential sources of soil lead contamination at the NSP2 properties. These include: the Continental Metal Company at 11500 Russell, the Federated Metals Division at 11630 Russell, and the Detroit Lead Pipe Works 7001 Lyndon. Both the Continental Metal Company and Federated Metals Division are located downwind of the NSP2 target area while the Detroit Lead Pipe Works is located upwind.

According to the Michigan Department of Environmental Quality's report, the highest lead concentration found upwind of the Federated Metals Division Lead Smelter and the Continental Metal Company was at 581 Rosedale measuring 380mg/kg, which is 20mg/kg below the maximum screening level and approximately 1.13 miles from the nearest NSP2 property in Highland Park. It is unlikely, given the upwind location of the NSP2 target area in relation to the smelter and distance between the smelter and the NSP2 target area that there is a high risk of atmospheric lead deposition originating from the Federated Metals Division or Continental Metal Company Lead Smelter.

The Detroit Lead Pipe Works Smelter is located approximately 1.76 miles from the nearest NSP2 property. While the NSP2 target area is located downwind of the Detroit Lead Pipe Works Smelter it is unlikely that the NSP2 target area is at high risk of smelter related atmospheric lead deposition. The testing site located at 14678 Livernois, approximately 1.66 miles from the nearest NSP2 property, tested for concentrations above 400mg/kg. However, the sampling results indicated that off-site lead concentrations of above 400mg/kg were sporadic and therefore not necessarily attributed to the former Smelting operations.

**Source Documentation:**

Appendices G-1- G-4: Maps of CERCLIS sites in relation to NSP2 properties

Appendix G-5: CERCLIS Database for Highland Park, MI

Appendices H-1 – H-3: Maps of the Michigan State Part 201 sites in relation to NSP2 properties

Appendix H-5: Part 201 Database for Highland Park, MI

Appendices I-1 – I-4: Maps of the Leaking Underground Storage Tanks sites in relation to NSP2 properties

Appendix I-5: LUST Sites for Highland Park, MI

Appendices J-1: Location of Lead Smelters in Wayne County

Appendices J-2 – J-4: Wind Rose charts for Federated Metals Division, Continental Metal Company Lead Smelter, and Detroit Lead Pipe Works.

Appendices J-5- J-8: Maps showing location of lead smelters to NSP2 properties

Michigan Department of Environmental Quality. August 2008. Executive Summary for the Wayne County/Detroit Area Historical Smelter Project Wayne County Michigan. Accessed online at [http://www.michigan.gov/documents/deq/deq-rrd-DS-ExecutiveSummary\\_282685\\_7.pdf](http://www.michigan.gov/documents/deq/deq-rrd-DS-ExecutiveSummary_282685_7.pdf)

( ) The project site has been cleaned up according to the appropriate standards required by MDEQ. A “no further action” letter was issued by MDEQ.

( ) Clean-up of the property is required and a “Due Care Plan” approval letter was issued by MDEQ.

( ) Clean-up of the property is currently underway. A “no further action” letter has not been issued but a “Due Care



Plan" approval letter was issued by MDEQ.

**ENVIRONMENTAL JUSTICE** [Copies of all documents related to the finding selected below must be retained in the project environmental review record (ERR).]

( ) The project is not in an Environmental Justice community of concern

( **X** ) The project is in an Environmental Justice community of concern but is expected to have no adverse effects on low income and minority residents providing the following criteria are met

- The project is compatible with surrounding land uses;
- The site and surrounding neighborhood do not suffer from adverse environmental conditions; and/or
- The proposed action will not create an adverse and disproportionate environmental impact or aggravate an existing impact.

According to U.S. Census Data, Highland Park has a minority population of 89.4 percent. Roughly 34.5 percent of the total population of the City of Highland Park lives below the poverty level, which is almost 20% over the average for the State of Michigan. The proposed activities are intended to enhance the present living environment of the area. Therefore, any impacts resulting from the demolition of blighted properties would most likely be positive by enhancing safety and aesthetics of the area and potentially reducing crime.

Properties that will undergo demolition should adhere to current zoning as well as local and national worker safety codes. The 33 demolitions may improve the appearance and character of the neighborhoods. The properties slated for demolition are blighted and cause a safety as well as aesthetic concern to surrounding properties.

**Source Documentation:**

- Appendix K: U.S. Census Bureau information for Highland Park
- Appendix L-1 and L-2: Highland Environmental Review Maps (Minority population and percent of population below poverty line)

( ) There are high and adverse effects on low income and minority residents, and the affected community residents have been informed and involved in a planning process to address the adverse effect from the project and the resulting changes.

**FLOOD DISASTER PROTECTION ACT**

1. Does the project involve the acquisition, construction or rehabilitation of structures, buildings or mobile homes?

( **X** ) No; flood insurance is not required. The review of this factor is completed.

( ) Yes; continue.

The project description consists solely of demolition of properties. Additionally, according to the FEMA Special Hazard Floodplain map, none of the proposed properties occur in the 100 year floodplain.

**Source Documentation**

**Appendix C-1 and C-2:** FEMA Flood Insurance Rate Map 26163C0125E dated February 2, 2012

2. Is the structure or part of the structure located in a FEMA designated Special Flood Hazard Area?

( ) No. Source Document (FEMA/FIRM floodplain zone designation, map panel number, date or other credible source): \_\_\_\_\_

(Factor review completed. Flood insurance is not required.)

( ) Yes. Source Document (FEMA/FIRM floodplain zone designation, panel number, date):  
\_\_\_\_\_ (Continue review).

3. Is the community participating in the National Insurance Program (or has less than one year passed since FEMA notification of Special Flood Hazards)?

( ) Yes [Flood Insurance under the National Flood Insurance Program must be obtained and maintained for the economic life of the project, in the amount of the total project cost. A copy of the flood insurance policy declaration must be kept in the Environmental Review Record.]

( ) No [Federal assistance may not be used in the Special Flood Hazards Area]

**COASTAL BARRIERS RESOURCES ACT**

1. Does the project involve any of the following uses of Federal assistance:

- acquisition, construction, repair, improvement or rehabilitation of public facilities;
- acquisition, construction, repair, improvement or rehabilitation of residential or non-residential structures;
- flood insurance for new or substantially improved structures;
- erosion control or stabilization of inlet, shoreline or inshore areas?

( X ) No The review of this factor is completed.

The Proposed Activities in the NSP2 area consist only of demolishing city-owned properties and therefore do not need to comply with the Coastal Barriers Resources Act.

**Source Documentation**

**Appendix M: John H. Cafee Coastal Barrier Resource Systems of Michigan Map**

( ) Yes; continue.

2. Is the project in Berrien or Wayne Counties and in an area bordering the Lake Michigan or Lake Erie, respectively?

( ) No; Cite Source Documentation:

\_\_\_\_\_ (Factor review completed)

( ) Yes; continue.

3. Is the project located in a coastal barrier resource designated on a FEMA map?

(See [www.fema.gov/nfip/cobra.shtml](http://www.fema.gov/nfip/cobra.shtml)).

( ) No; Cite Source Documentation:

\_\_\_\_\_ (Factor review completed).

( ) Yes - Federal assistance may not be used in such an area.

**DISCLOSURE OF PROPERTIES IN A RUNWAY CLEAR ZONE OR CLEAR ZONE**

1. Does the project involve the sale or acquisition of an existing building or structure?

( X ) No. The review of this factor is completed.

The proposed action consists only of demolition and therefore is not subject to 24 CFR § 51.303(a)(3). Additionally, there are no projects located within 2,500 feet of the end of a runway. The project target area is approximately 16,000 feet from the closest airport.

**Source Documentation**

**Appendix N: Distance between NSP2 target area and airport runway**

( ) Yes; continue.

2. Is the building/structure within a Civil Airport's Runway Clear Zone, or a Military Installation's Clear Zone?

( ) No; Cite Source Documentation:

\_\_\_\_\_ Project complies with 24  
CFR 51.303(a)(3). The review of this factor is completed.

( ) Yes; **Disclosure statement must be provided** to buyer and a copy of the signed disclosure statement must be maintained in the project Environmental Review Record [24 CFR 51.303(a)(3)].

\_\_\_\_\_  
Signature/Preparer Name:   
Title, Agency or Organization

\_\_\_\_\_  
Date

\_\_\_\_\_  
Authorized Approving Official/Signature, Title and Agency

\_\_\_\_\_  
Date

## Instructions on the Documentation Required for Tier II (Site Specific) Review Findings in the Environmental Review Record (ERR) Michigan NSP2 Consortium Program

### HISTORIC PRESERVATION

The subrecipient must have one of these types of documentation in the ERR:

- ◆ Letter from the State Historic Preservation Officer (i.e., State Bureau of History) that concurs with “no historic properties affected” finding
  - ✓ “No historic properties affected”- Based upon the subrecipient’s description of: 1) the undertaking and the “area of potential effects” (APE), including photographs, maps, and drawings, as necessary, 2) steps taken to identify historic properties, and 3) the basis for determining that no historic properties are present or affected; OR
  - ✓ Based upon the HUD memorandum, *Acquisition/Resale Activities Determined to have “No Potential to Cause Effects” to Historic Properties*, issued June 30, 2010.
- ◆ The record contains documentation (as described above in numbers 1 - 3) “No historic properties affected” and the State Historic Preservation Officer (SHPO) has not objected within 30 days of having received such documentation from the subrecipient. [NOTE: The subrecipient must verify the date on which the SHPO received the subrecipient’s request.]
- ◆ Letter from the SHPO that concurs with a finding of “no adverse effect”.
  - ✓ “No adverse effect” - Based upon the subrecipient’s description of: 1) the undertaking and the APE (including photographs, maps, and drawings, as necessary), 2) steps taken to identify historic properties, 3) affected historic properties (including characteristics qualifying them for the NR), 4) the undertaking’s effects of historic properties, 5) why the criteria of adverse effect were not applicable (§ 800.5), and 6) copies or summaries of any views provided by consulting parties and the public.
- ◆ Letter from SHPO that concurs with a finding of “adverse effect”.
  - ✓ “Adverse effect” – Based upon the subrecipient’s description of: 1) the undertaking and the APE (including photographs, maps, and drawings, as necessary), 2) steps taken to identify historic properties, 3) affected historic properties (including characteristics qualifying them for the NR), 4) the undertaking’s effects of historic properties, 5) why the criteria of adverse effect are applicable (§ 800.5), and 6) copies or summaries of any views provided by consulting parties and the public.
  - ✓ If the subrecipient determines a Memorandum of Agreement must be executed between MSHDA, SHPO, and the subrecipient to resolve adverse effects, provide MSHDA with the documentation leading to the subrecipient’s conclusion and evidence of consultation.

### FLOODPLAIN MANAGEMENT

The subrecipient must have one of these types of documentation in the ERR:

- ◆ Evidence the proposed action is not within a special flood hazard area mapped by FEMA (i.e., 100-year floodplain). The project location and/or boundary must be identified on an official FEMA map (i.e., FIRMette). The flood zone where the project is located, as well as the community panel number and the date the map was issued must be present on the FIRMette.
- ◆ Documentation the decision making process is not applicable by citing the applicable subsection of § 55.12.

- ✓ HUD has determined that certain activities are excluded from the 8-step decision-making process (§ 55.20) even though buildings may be within a special flood hazard area. This includes HUD assistance for purchasing, mortgaging, or refinancing one to four unit properties not in a floodway or coastal high hazard area and not involving a critical action (refer to § 55.2 for the definition of “floodway”, “coastal high hazard area” and “critical action”). With regard to rehabilitation of one to four unit properties, any HUD assistance falling below the threshold of “substantial improvement” [§55.2(a)(8)] is considered “minor repairs or improvements” and is not subject to the 8 Step Process. In addition, Part 55 is not applicable if FEMA has issued a Letter of Map Revision (LOMR) or Letter of Map Amendment (LOMA) for the subject site identified on a FEMA map as being in a floodplain.
- ◆ Notify MSHDA that completion of the 8 step decision making process is required.
  - ✓ Prior to completing the 8 step decision making process, determine from MSHDA whether an 8 step process has already been completed for the entire census tract (or community wide).
  - ✓ Complete the 8 step decision making process by:
    - Ensuring that both public notices (Steps 2 and 7 of the decision making process) identify MSHDA as the responsible entity (RE) for receiving public comments. Both notices must be issued in the community where projects are located. Submit the draft notices to MSHDA for approval of their content prior to publishing.
    - Following publication of the Early Notice (Step 2), document compliance with Steps 3 through 6. Then, publish the Final Notice (Step 7). Consult with MSHDA on the procedures for implementing the required mitigation measures that must be incorporated into the project (Step 8).
    - As the RE in the environmental review process, MSHDA may disapprove projects or notices for inadequate information, insufficient mitigation measures, or other deficiencies.
    - Retaining copies of all written documentation associated with the 8-step decision process in the ERR. This includes copies of both published notices, any comments received by MSHDA, and responses made to those comments.

### **COASTAL ZONE MANAGEMENT ACT**

The subrecipient must have one of these types of documentation in the ERR:

- ◆ A general location map or statement establishing there are no coastal zone management areas in the community or state, or use other documentation that may be available.
- ◆ A map or a statement from the local planning department or state coastal commission, or district as evidence the project is not in the CZMA.
- ◆ A “Federal consistency determination” from the state coastal commission or district.

### **CLEAN AIR ACT**

The subrecipient must have one of these types of documentation in eth ERR:

- ◆ Determination from a resource expert that the proposed action is not of a type that would contribute air pollution.
- ◆ Evidence that the proposed action is within an area in *attainment* with the National Ambient Air Quality Standards (NAAQS) for all six pollutants (carbon monoxide, lead, nitrogen dioxide, ozone, particulates, and sulfur dioxide).



- ◆ Evidence that the proposed action is within an area in *non-attainment* with one or more of the pollutants but is in conformance with the State Implementation Plan (SIP).
- ◆ Evidence that the proposed action is within an area in non-attainment with one or more of the pollutants and mitigation measures have been identified to bring it into conformance with the State Implementation Plan (SIP).

For removal of regulated asbestos containing materials (RACM), the subrecipient must provide MSHDA with one of these types of documentation:

- ◆ The project does not meet the definition of a “facility” or “installation”, according to 40 CFR Part 61, Subpart M (National Emission Standard for Asbestos).
- ◆ Consultation was completed with the State or local air quality management district or commission having jurisdiction where the project is located regarding conformance with the SIP and air quality regulations.
  - ✓ Provide MSHDA with document that construction contractors have disposed of the RACMs, in accordance with the U.S. EPA or state regulatory requirements.

#### **NOISE ABATEMENT AND CONTROL (24 CFR 51B)**

The subrecipient must have one of these types of documentation in the ERR:

- ◆ Documentation the proposed action **is not** within 1000 feet of a major roadway, 3,000 feet of a railroad, or 15 miles of a military or FAA-regulated civil airfield.
- ◆ If within those distances, the project is not a “noise sensitive land development” [24 CFR 51.101(a)(2)]---i.e., acquisition, demolition and rehabilitation. [However, HUD’s noise regulation does apply to reconstruction, new construction, conversion of a building to an alternative use, and substantial rehabilitation---i.e., exceeds the thresholds for categorical exclusion in § 58.35(a)].
- ◆ If within those distances, documentation showing the noise level is *Acceptable* (at or below 65 DNL) Documentation should include data sources and calculations. **The noise calculation must project noise levels 10 years in the future.**
- ◆ If within those distances and not acceptable (66 – 75 DNL, according to a noise assessment calculation) through field observation and/or other information it’s been established that there is an effective noise barrier (i.e., it’s of sufficient height and length to break the line-of-sight between the noise source and the project site).
- ◆ Documentation (including noise assessment calculations and data sources) shows that noise generated by the noise source(s) is *Normally Unacceptable*. The subrecipient must ensure noise attenuation requirements will bring the interior noise level to 45 DNL and/or exterior noise level to 65 DNL. (NOTE: Whenever, interior noise attenuation will be provided, then mechanical ventilation must also be included among the mitigation requirements.)
- ◆ Noise levels are determined to be *Unacceptable* (>75 DNL). An environmental impact statement is required unless MSHDA’s certifying officer determines completion of an environmental impact statement (EIS) can be waived [§ 51.104(b)(2)]

#### **AIRPORT CLEAR ZONES (24 CFR 51D)**

The subrecipient must have one of these types of documentation in the ERR:

- ◆ Documentation that the rule is not applicable to the proposed project (i.e., acquisition of an existing building, “minor” rehabilitation, or emergency action) [24 CFR 51.302(c) and (d)].

- ✓ “Minor” rehabilitation/modernization means, for Clear Zones and Runway Protection Zones at military airfields, the work does not significantly prolong the physical or economic life of a building. For Accident Potential Zones at FAA-regulated civil airfields, the work does not change its use, increase density, or introduce explosive, flammable, or toxic materials. (See § 51.302.)
- ◆ Documentation that there aren’t any FAA-regulated airports within 2,500 feet and/or Dept. of Defense airfields within 15,000 feet (about 2.8 miles) of the proposed project.
- ◆ Documentation that the project is within the specified distances, but that the map of the airport/airfield or a letter from the airport/airfield operators shows the proposed action is not located within a Runway Protection Zone, Clear Zone, or Accident Potential Zone.

### **HAZARDOUS OPERATIONS (ABOVEGROUND STORAGE TANKS) (24 CFR 51C)**

The subrecipient must have one of these types of documentation in the ERR:

- ◆ Documentation that the proposed action does not meet the definition of a “HUD assisted project” (§ 51.201).
  - ✓ The regulation applies to the new construction, as well as rehabilitation or modernization of a building or buildings only when such work will increase residential densities (i.e., number of dwelling units or rooming units), or by converting the use of a building to habitation, or makes a vacant building habitable (§ 51.201, “HUD-Assisted Project”). It does not apply to acquisition and demolition.
- ◆ Documentation from local authorities and/or aerial photos that show no aboveground tanks are within one mile.
- ◆ If tanks are within one mile, documentation should include calculation of the acceptable separation distance (ASD), according to the HUD guidebook. Provide to MSHDA the calculated ASD results, identification of the fuel type(s), along with making one of the following findings:
  - ✓ There is an effective barrier (include a description of the barrier and its height and length. A photograph may be appropriate as well).
  - ✓ Using HUD’s calculation methodology, the calculations provided evidence there is an acceptable separation distance for people and buildings.
  - ✓ Mitigation has been designed to protect people and buildings. A detailed description of the mitigation measures is being provided. MSHDA’s certifying officer needs to decide whether the proposed mitigation measures are acceptable (24 CFR 51.206).

### **TOXIC SUBSTANCES AND RADIOACTIVE MATERIALS [24 CFR 58.5(i)]**

The subrecipient must have one of these types of documentation in the ERR:

- ◆ For single family housing projects, evidence from a qualified professional, or through written records, databases, or other documentation that there is no contamination on or near the site that would present a health hazard to occupants of the project.
- ◆ A Phase I ESA must be completed for single family housing projects where a nearby potential contaminated site exists or was known to exist (such as a current of former gas station or dry cleaners) that could present a health hazard to occupants of the project.
- ◆ Documentation the site has been cleaned up according to Michigan State Department of Environmental Quality (MDEQ) standards for residential properties, and a letter of “no further action required” was issued by MDEQ. Copies of all reports related to site cleanup must be attached to the Tier II form.

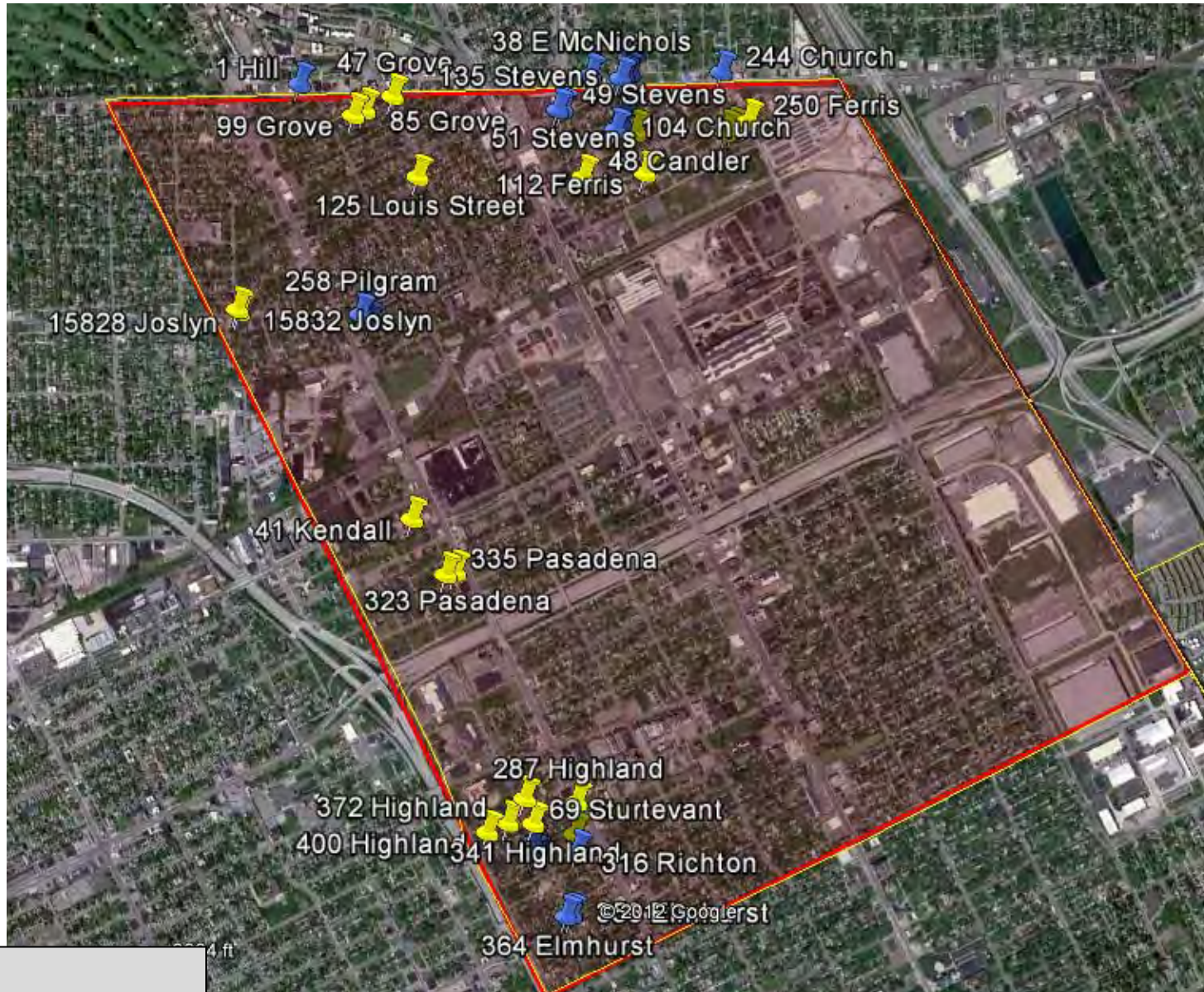
- ◆ Clean up of the site is required and MDEQ has approved a *Response Activity Plan* or issued a *Due Care Plan approval letter*. A copy of the letter and all reports related to site cleanup and correspondence with the MDEQ must be attached to the Tier II form.
- ◆ Clean up of the site is currently underway. A letter of “no further action” has not been issued, but MDEQ has approved a *Response Activity Plan* or issued a *Due Care Plan approval letter*. A copy of the letter and all the reports related to site cleanup and correspondence with the oversight agency (i.e., U.S. EPA or MDEQ) must be attached to the Tier II form.


## **ENVIRONMENTAL JUSTICE**

The subrecipient must have ALL these types of documentation in the ERR:

- ◆ Evidence whether or not the project is in an Environmental Justice community of concern (demographics, income, etc.).
- ◆ Evidence that the proposed action is compatible with surrounding land uses.
- ◆ Evidence that the site or surrounding neighborhood does not suffer from adverse environmental conditions.
- ◆ Evidence that the proposed action will not create an adverse and disproportionate environmental impact or aggravate an existing impact (Describe how the proposed action will not have a disproportionate adverse impact on minority populations and low income populations).
- ◆ If there are high and adverse effects on low income and minority residents, the grantee shall provide MSHDA with documentation that the affected community residents have been meaningfully informed and involved in a participatory planning process to address (remove, mitigate, or minimize) the adverse effect from the project and the resulting changes.

# Appendix A: Demolition Sites of Highland Park



 City of Highland Park  
Yellow and blue pins— Site Locations

Appendix B: Letter from State Historic Preservation Officer to  
the City of Highland Park





JENNIFER GRANHOLM  
GOVERNOR

STATE OF MICHIGAN  
MICHIGAN STATE HOUSING DEVELOPMENT AUTHORITY  
LANSING

GARY HEIDEL  
INTERIM EXECUTIVE DIRECTOR

July 12, 2010

YVETTE ROBINSON  
COMMUNITY AND ECONOMIC DEVELOPMENT  
CITY OF HIGHLAND PARK  
12050 WOODWARD AVENUE  
HIGHLAND PARK MI 48203

RE: ER-06-659.NSP2 Neighborhood Stabilization Program 2 (NSP2) Funding MSHDA Grant #NS2-2009-0343, City of Highland Park, Wayne County (HUD)

Dear Ms. Robinson:

We have received your request to review, under the authority of Section 106 of the National Historic Preservation Act of 1966, as amended, the above-cited program's potential for effects on historic properties.

### Historic Properties

Section 106 of the National Historic Preservation Act of 1966, as amended, requires federal agencies, or their delegated authorities, to take into account the effects of their undertakings on historic properties. Historic properties are defined as any prehistoric or historic district, site, building, structure, or object included in or eligible for inclusion in the National Register of Historic Places. We encourage investment in historic properties and districts.

Within the target areas identified for the NSP2 program, the following historic districts have been identified in Highland Park. The Palmer Park Boulevard Apartment Buildings Historic District is located on the south side of west McNichols Road between Rosa Parks Boulevard and Log Cabin Street. The National Register listed Medbury's Grove Lawn Historic District and an expansion area that is eligible for listing on the National Register are bounded roughly by Louise Street, Woodward Avenue, Puritan Street, and Harrison Avenue. The Highland Park Ford Plant district is bounded roughly by Oakland, Manchester, and Woodward Avenue. Please see the enclosed maps outlining the boundaries of these districts. **Projects located within the boundaries of these districts will need to be submitted to the SHPO for review.**

If the City of Highland Park and the Michigan Land Bank are interested in reducing the number of projects that the SHPO will need to review, we recommend that the City and the Land Bank, in partnership with MSHDA, contract with someone who meets the 36 CFR Part 61 qualifications for architectural history or historic architect to perform a survey of the existing historic districts to determine which properties contribute to the historic district and which properties could be considered non-contributing properties. This survey should be coordinated with the SHPO to ensure that the data is collected in the appropriate format. Once this assessment is complete, it should be submitted to the SHPO for consultation and concurrence. Once a contributing/non-contributing list is agreed to by all parties, projects involving those properties that are considered non-contributing would not need to be reviewed by the SHPO.

### Submitting projects to the SHPO for review

Certain rehabilitation activities have little potential to have an effect on historic properties. If your project involves a property that **is less than fifty years old**, or **only** the work items listed below, no historic properties will be affected per 36 CFR § 800.4(d) and it is not necessary for the SHPO to review the rehabilitation project.





JENNIFER GRANHOLM  
GOVERNOR

STATE OF MICHIGAN  
MICHIGAN STATE HOUSING DEVELOPMENT AUTHORITY  
LANSING

GARY HEIDEL  
INTERIM EXECUTIVE DIRECTOR

**Interior Rehabilitation**

**Exterior Rehabilitation**

Electrical work

Caulking, weather stripping, or replacement of missing or damaged window glass with glass of the same surface qualities (color, texture, and reflectivity)

Installation of new kitchen and bath appliances, cabinets, counters, tubs, sinks and toilets

Installation or replacement of gutters and downspouts (if the color is historically appropriate for the period and style of the historic resource)

Installation of insulation provided it is restricted to attics, crawl spaces, the upper surfaces of existing ceilings when the ceilings are not dropped ceilings, and proper vapor barriers are used

Flat or shallow pitch roof repair or replacement (shallow pitch is understood to have a rise-to-run ratio equal to or less than 3" to 12"), with no part of the surface of the roof visible from the ground

Installation of smoke or carbon monoxide alarms

Painting *previously painted* surfaces in color(s) historically appropriate for the period and style of the historic resource

Interior surface treatments (floors, walls, ceilings and woodwork) provided the work is restricted to repainting, refinishing, repapering, or laying carpet or linoleum and the feature is not significant to the historic character of the property

In-kind replacement of roofing materials (asphalt shingles with asphalt shingles of the same pattern, for example)

Plumbing rehabilitation work and replacement, including pipes and fixtures

*Repair of existing* wheelchair ramps

Repair or replacement of concrete basement floors and interior basement walls

Repair or replacement of existing siding if done with siding that matches the existing siding in dimension, profile and material

Repair, replacement or cleaning of existing water heaters, heating systems (including duct work and piping) or other appliances

Repair, replacement or installation of new sidewalks or driveways that match the existing sidewalk or driveway in materials and dimensions

Replacement of door locks

Repair or replacement of chimneys with the same material and dimensions

Restroom improvements for handicapped access provided that the work is contained within the existing restroom

Repair of porch ceilings, steps, floors or railing if done in-kind to match existing original materials, configuration and dimensions

Repair or repainting of existing storm windows

For rehabilitation projects involving houses considered individually historic or located in historic districts, the SHPO will need the following information for a review of the project:

- A cover letter
- A completed Housing Rehabilitation Inventory Card
- Plans and specifications of the work to be done





JENNIFER GRANHOLM  
GOVERNOR

STATE OF MICHIGAN  
MICHIGAN STATE HOUSING DEVELOPMENT AUTHORITY  
LANSING

GARY HEIDEL  
INTERIM EXECUTIVE DIRECTOR

For demolition projects involving houses considered individually historic or located in historic districts, the SHPO will need the following information for a review of the project:

1. A cover letter.
2. Photographs of the property, interior and exterior, that clearly show the condition of the house. At least one photograph must show the front of the property head-on.
3. A map clearly indicating the location of the property. Cross streets must be visible on the map and it must be clear on which side of the street the property is located.
4. Photographs of the other properties on the same block as the house to be demolished, giving us an indication of the context of the property. More than one adjacent building may be included in each photograph.
5. A written condition assessment of the property that indicates specific deficiencies in the property.
6. An estimate of how much it would cost to rehabilitate the property and an estimate of how much the property might sell for once it is rehabilitated.
7. An explanation for why the property has not been considered for rehabilitation under the NSP2 program.
8. Information documenting the condition of the neighborhood: Is the neighborhood a tipping point neighborhood, or is there such a high rate of abandonment that the neighborhood realistically cannot be saved? Qualitative and quantitative data indicating the condition of the neighborhood, and the city as a whole, that would give the SHPO a better understanding of the context in which decisions are being made about the individual properties should be submitted to the SHPO.
9. A copy of public comment for the project.

### Other properties

It is the opinion of the SHPO that for projects involving single-family residential structures that are not individually listed in or eligible for listing in the National Register of Historic Places, or that are not located within the above defined historic districts, **no historic properties are affected** by those undertakings. Therefore, single-family residential projects that are not included in the list of individually listed or eligible properties above, and that are not located in the historic districts outlined above, may proceed without further consultation with the SHPO.

The above applies only to single-family residential structures. All rehabilitation or demolition projects that involve properties that are fifty years or older and that are not single-family residential structures must be submitted to the SHPO for review. Properties that were originally built as single-family residences but have since been divided into multi-family residential structures should be treated as if they were single-family residential structures for the purpose of determining whether or not a SHPO review is required.

Properties that are not single-family residential structures must be submitted to the SHPO for review with the following information:

1. A cover letter
2. Photographs of the property, interior and exterior, that clearly show the condition of the property. At least one photograph must show the front of the property in its entirety.
3. A map clearly indicating the location of the property. Cross streets must be visible on the map and it must be clear on which side of the street the property is located.
4. A history of the property, including the date of construction, the past uses of the property, the architect and original owners of the property. Copies of the primary and secondary materials such as Sanborn maps, city directory listings, county histories, etc. from which the information may have been obtained should be included.





JENNIFER GRANHOLM  
GOVERNOR

STATE OF MICHIGAN  
MICHIGAN STATE HOUSING DEVELOPMENT AUTHORITY  
LANSING

GARY HEIDEL  
INTERIM EXECUTIVE DIRECTOR

5. A determination of eligibility made by someone who meets the 36 CFR Part 61 qualifications for architectural history or historic architect
6. Plans and specifications, if the property is to be rehabilitated and is determined to be listed in or eligible for listing in the National Register of Historic Places.
7. If the property is to be demolished, and has been determined to be listed in or eligible for listing in the National Register of Historic Places, an explanation of why the property cannot be either rehabilitated or mothballed. The explanation should be backed up with documentation including costs for rehabilitation/mothballing the property, a written condition assessment of the property that indicates specific deficiencies in the property, and any other information that was pertinent to the decision-making process. A copy of public comment for the project should also be submitted to the SHPO.

The views of the public are essential to informed decision making in the Section 106 process. Federal Agency Officials or their delegated authorities must plan to involve the public in a manner that reflects the nature and complexity of the undertaking, its effects on historic properties and other provisions per 36 CFR § 800.2(d).

We remind you that Federal Agency Officials or their delegated authorities are required to consult with the appropriate Indian tribe and/or Tribal Historic Preservation Officer (THPO) when the undertaking may occur on or affect any historic properties on tribal lands. **In all cases**, whether the project occurs on tribal lands or not, Federal Agency Officials or their delegated authorities are also required to make a reasonable and good faith effort to identify any Indian tribes or Native Hawaiian organizations that might attach religious and cultural significance to historic properties in the area of potential effects and invite them to be consulting parties per 36 CFR § 800.2(c-f).

If you find these conditions acceptable, please sign the acceptance letter that follows and return the signed original to us. The acceptance letter must be signed by an agency official with legal and financial responsibility for the above-cited program [36 CFR § 800.2(a)].

For more information on HUD-funded projects and the Section 106 process, please visit <http://mishporehab.wordpress.com>. The site contains a list of frequently asked questions, a plain-English translation of the 16-page HUD memo, online forms that can be downloaded for submission to our office, along with useful rehabilitation information.

If you have any questions, please contact Diane Tuinstra, Cultural Resource Protection Specialist, at (517) 335-2723. **Please reference our project number in all communication with this office regarding this program.** Thank you for this opportunity to review and comment, and for your cooperation.

Sincerely,

Brian D. Conway  
State Historic Preservation Officer

BDC:DRT

Enclosure(s)

Copy: Jaime Loichinger, ACHP  
Carmen Reveron, HUD Detroit  
Carolyn Cunningham, MSHDA (2 copies)





JENNIFER GRANHOLM  
GOVERNOR

STATE OF MICHIGAN  
MICHIGAN STATE HOUSING DEVELOPMENT AUTHORITY  
LANSING

GARY HEIDEL  
INTERIM EXECUTIVE DIRECTOR

YVETTE ROBINSON  
COMMUNITY AND ECONOMIC DEVELOPMENT  
CITY OF HIGHLAND PARK  
12050 WOODWARD AVENUE  
HIGHLAND PARK MI 48203

RE: ACCEPTANCE LETTER

ER-06-659.NSP2 Neighborhood Stabilization Program 2 (NSP2) Funding MSHDA Grant #NS2-2009-0343, City of Highland Park, Wayne County (HUD)

We have received comments from the State Historic Preservation Office (SHPO) in regards to our NSP2 funding. We intend to follow the guidelines set forth in the memorandum between the U.S. Department of Housing and Urban Development (HUD) and the SHPO.

I concur: \_\_\_\_\_ Date: \_\_\_\_\_

Printed name and title of agency official: \_\_\_\_\_







STATE OF MICHIGAN

RICK SNYDER  
GOVERNOR

MICHIGAN STATE HOUSING DEVELOPMENT AUTHORITY  
STATE HISTORIC PRESERVATION OFFICE

GARY HEIDEL  
EXECUTIVE DIRECTOR

June 7, 2012

MR SANDY M MCDONALD  
CITY OF HIGHLAND PARK  
COMMUNITY & ECONOMIC DEVELOPMENT DEPARTMENT  
12050 WOODWARD AVENUE  
HIGHLAND PARK MI 48203

RE: ER-12-362 NSP2 Demolitions of Duplexes located at 104-106 Church Street, 258-260 Cortland Street, 359-361 Cortland Street, 356 Elmhurst Street, 92 Kendall Street, 258-260 Pilgrim Street, 257-259 Pilgrim Street, 316 Richton Street, 132 Stevens Street, 135 Stevens Street, and 139 Stevens Street, Highland Park, Wayne County (HUD)

Dear Mr. McDonald:

Under the authority of Section 106 of the National Historic Preservation Act of 1966, as amended, we have reviewed the above-cited undertakings at the locations noted above. Based on the information provided for our review, the State Historic Preservation Officer (SHPO) concurs with the determination of the City of Highland Park that **no historic properties are affected** within the area of potential effects of these undertakings.

The views of the public are essential to informed decision making in the Section 106 process. Federal Agency Officials or their delegated authorities must plan to involve the public in a manner that reflects the nature and complexity of the undertaking, its effects on historic properties and other provisions per 36 CFR § 800.2(d). We remind you that Federal Agency Officials or their delegated authorities are required to consult with the appropriate Indian tribe and/or Tribal Historic Preservation Officer (THPO) when the undertaking may occur on or affect any historic properties on tribal lands. **In all cases**, whether the project occurs on tribal lands or not, Federal Agency Officials or their delegated authorities are also required to make a reasonable and good faith effort to identify any Indian tribes or Native Hawaiian organizations that might attach religious and cultural significance to historic properties in the area of potential effects and invite them to be consulting parties per 36 CFR § 800.2(c-f).

This letter evidences the Michigan State Housing Development Authority's compliance with 36 CFR § 800.4 "Identification of historic properties", and the fulfillment of the Michigan State Housing Development Authority's responsibility to notify the SHPO, as a consulting party in the Section 106 process, under 36 CFR § 800.4(d)(1) "No historic properties affected."

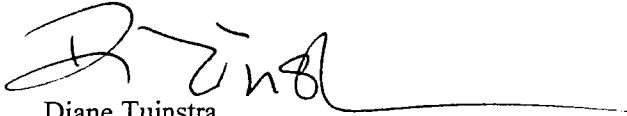
The State Historic Preservation Office is not the office of record for these undertakings. You are therefore asked to maintain a copy of this letter with your environmental review record for these undertakings. If the scope of work changes in any way, or if artifacts or bones are discovered, please notify this office immediately.

If you have any questions, please contact Diane Tuinstra, Cultural Resource Management Specialist, at (517) 335-2723 or by email at [tuinstrad@michigan.gov](mailto:tuinstrad@michigan.gov). **Please reference our project number in all**



**communication with this office regarding these undertakings.** Thank you for this opportunity to review and comment, and for your cooperation.

Sincerely,

A handwritten signature in black ink, appearing to read "D. Tuinstra", with a long horizontal line extending to the right.

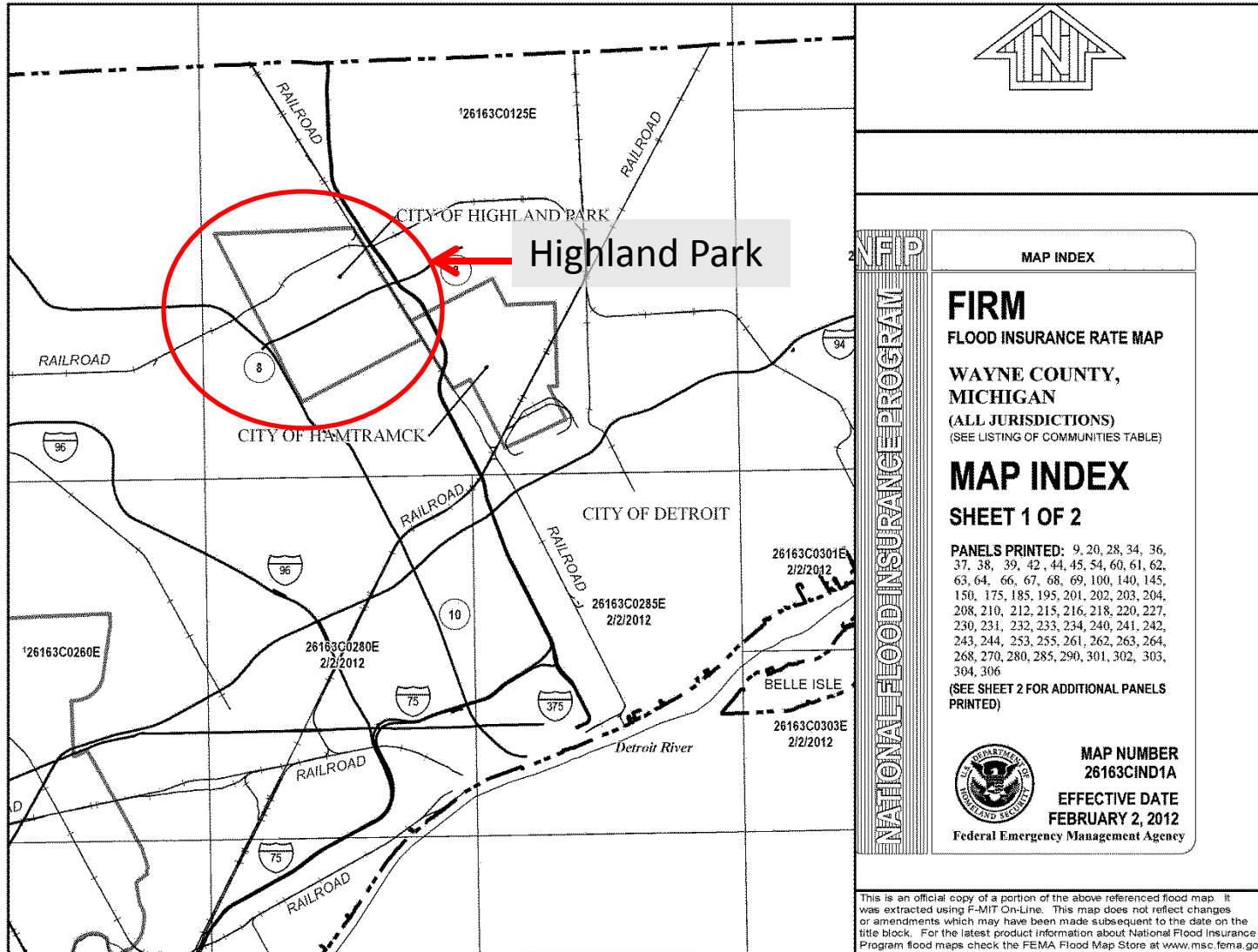
Diane Tuinstra  
Cultural Resource Management Specialist

for Brian D. Conway  
State Historic Preservation Officer

DRT

Copy: Carmen Reveron, HUD Detroit  
Carolyn Cunningham,  
Sue DeVries,  
Esther Haugabook,  
Louis Vinson,  
Jeff Huntington, Michigan Land Bank Fast Track Authority  
Regina Solomon, Capital Access

# Appendix C-1: FEMA Flood Insurance Rate Map



MAP INDEX

**FIRM**  
FLOOD INSURANCE RATE MAP

WAYNE COUNTY,  
MICHIGAN  
(ALL JURISDICTIONS)  
(SEE LISTING OF COMMUNITIES TABLE)

**MAP INDEX**  
SHEET 1 OF 2

PANELS PRINTED: 9, 20, 28, 34, 36, 37, 38, 39, 42, 44, 45, 54, 60, 61, 62, 63, 64, 66, 67, 68, 69, 100, 140, 145, 150, 175, 185, 195, 201, 202, 203, 204, 208, 210, 212, 215, 216, 218, 220, 227, 230, 231, 232, 233, 234, 240, 241, 242, 243, 244, 253, 255, 261, 262, 263, 264, 268, 270, 280, 285, 290, 301, 302, 303, 304, 306  
(SEE SHEET 2 FOR ADDITIONAL PANELS PRINTED)



MAP NUMBER  
26163CIND1A

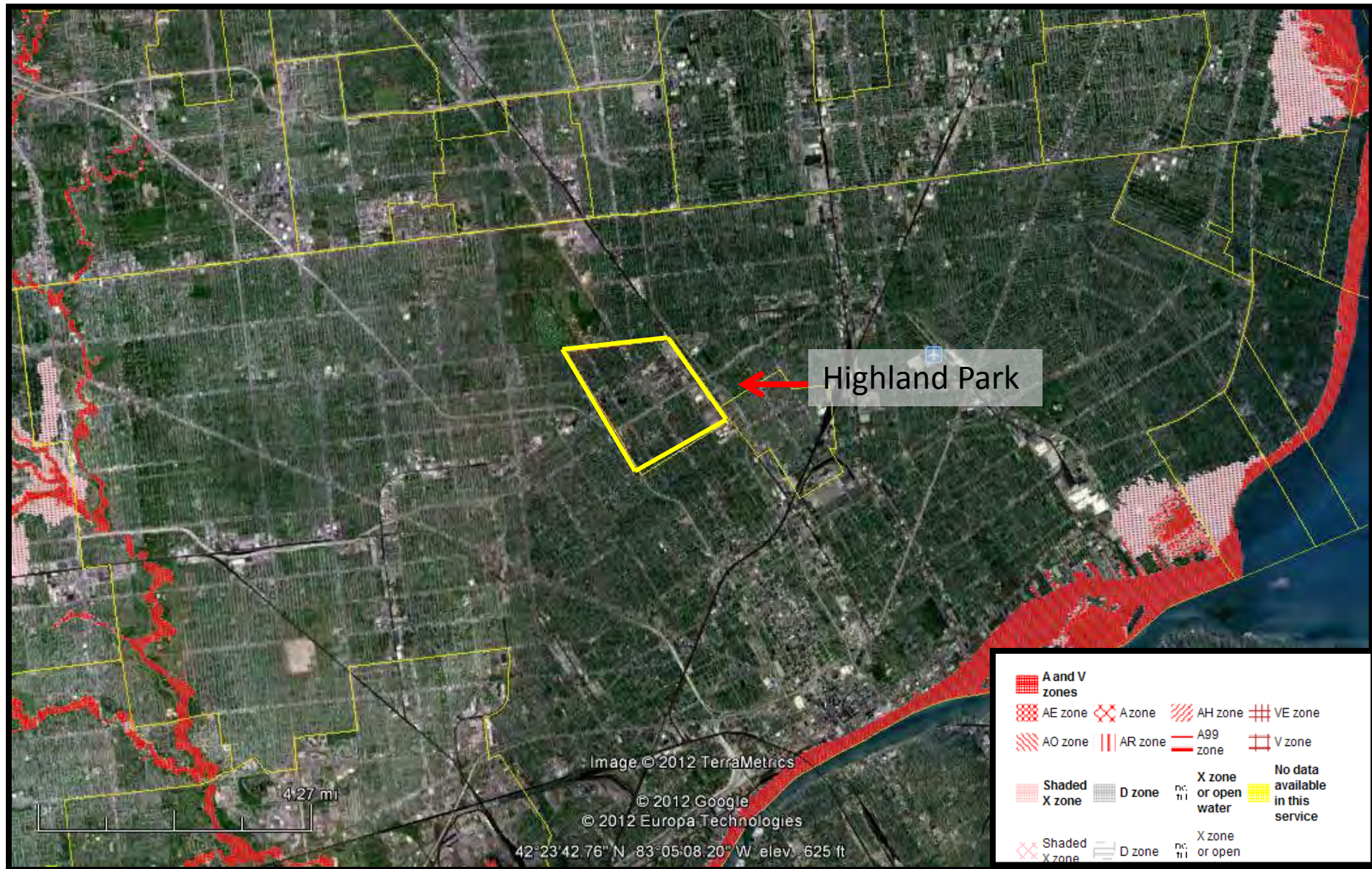
EFFECTIVE DATE  
FEBRUARY 2, 2012

Federal Emergency Management Agency

This is an official copy of a portion of the above referenced flood map. It was extracted using F-MIT On-Line. This map does not reflect changes or amendments which may have been made subsequent to the date on the title block. For the latest product information about National Flood Insurance Program flood maps check the FEMA Flood Map Store at [www.msc.fema.gov](http://www.msc.fema.gov)



# Appendix C-2: 100 Year Floodplains in Wayne County





# Appendix D: Coastal Zone Management Area of Wayne County



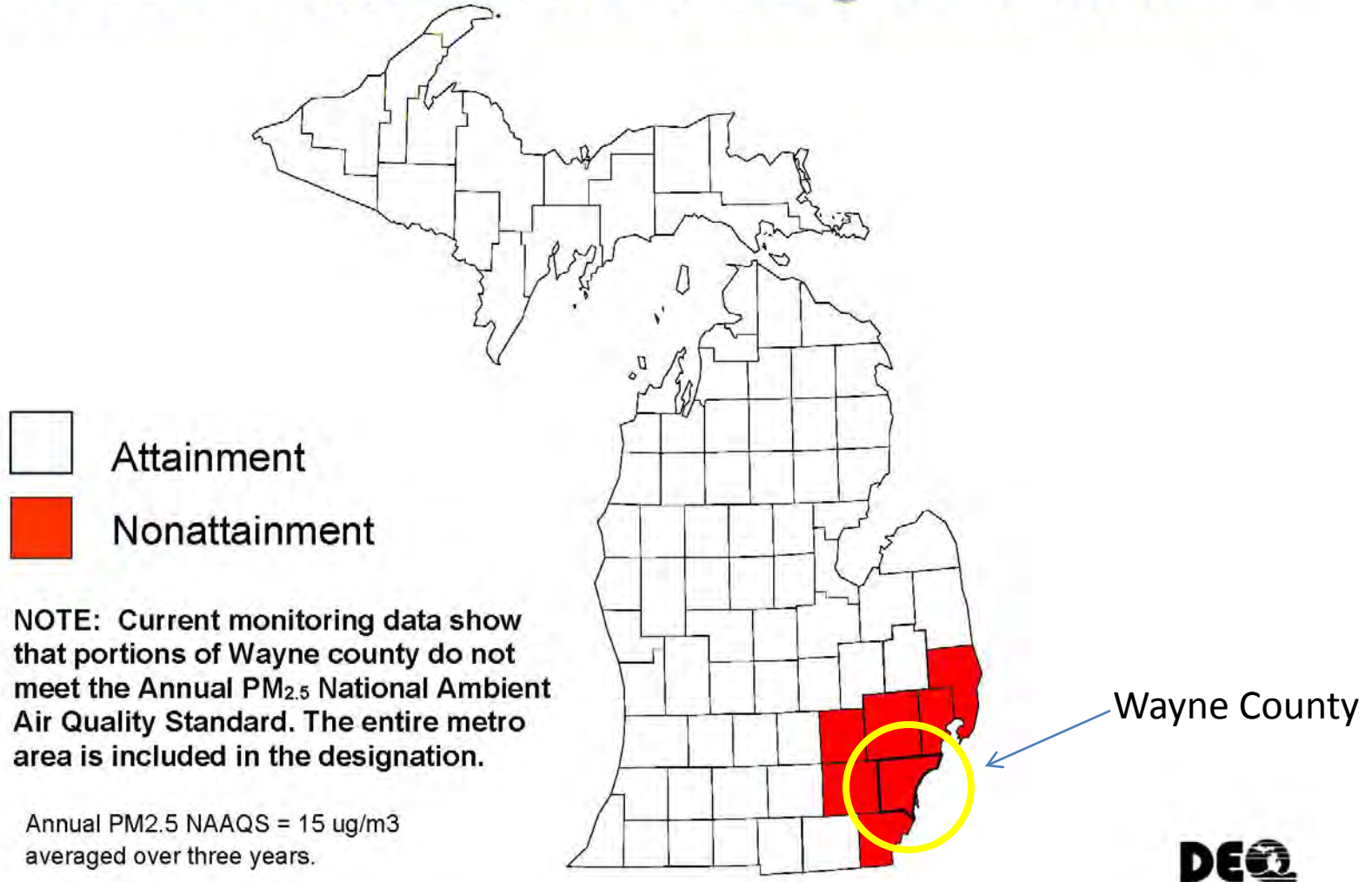
Coastal Zone Management Areas - Detroit, Highland Park, Hamtramck



City of Highland Park

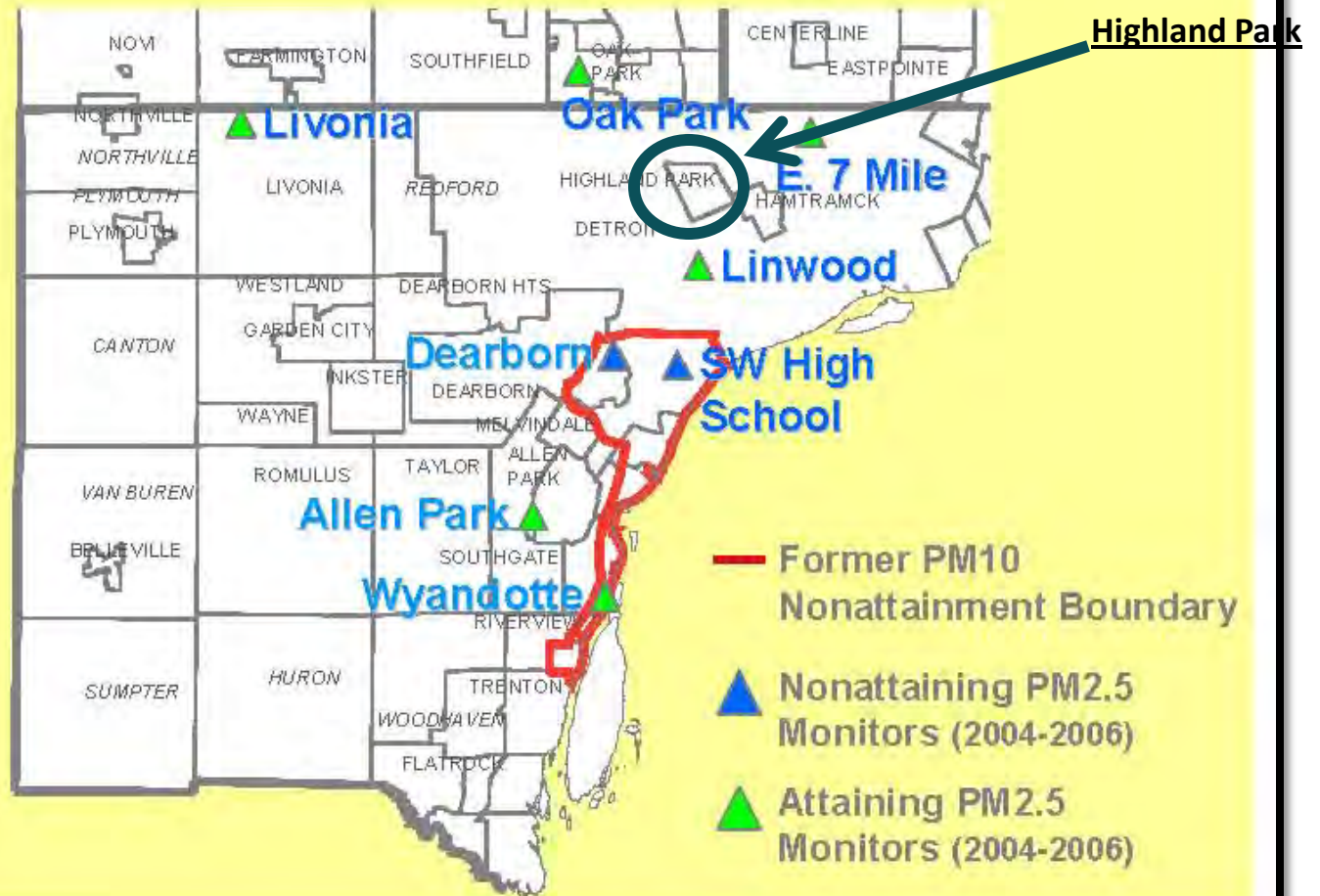


## Annual PM<sub>2.5</sub> Attainment Designation Status



# Appendix E-2: Area of Non-attainment from Michigan State Implementation Plan

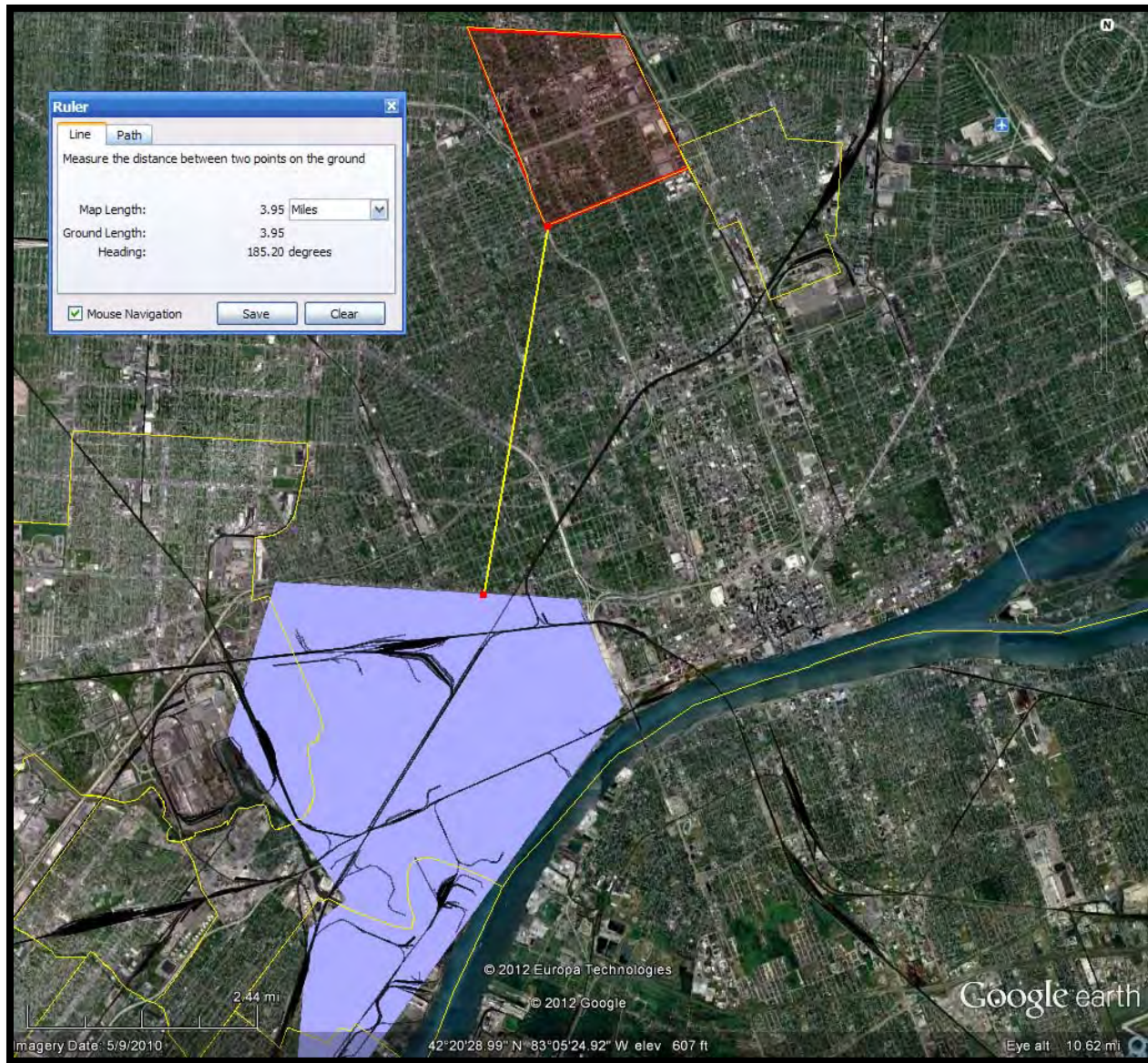
Figure 2.2: Former PM10 Nonattainment Area with Overlay of PM2.5 Monitors Wayne County



Source: SEMCOG



# Appendix E-3: NSP2 Target Project area in relation to area of non-attainment



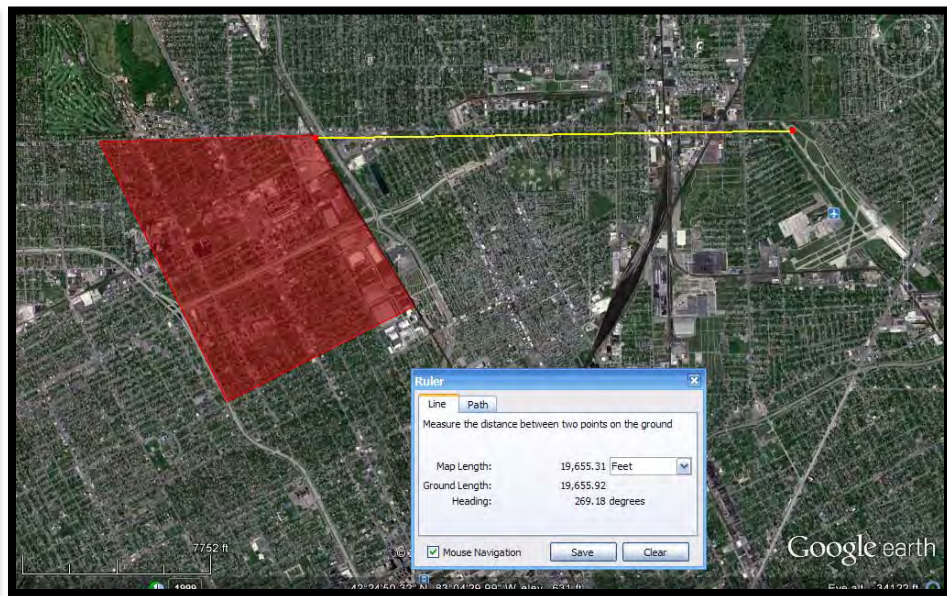
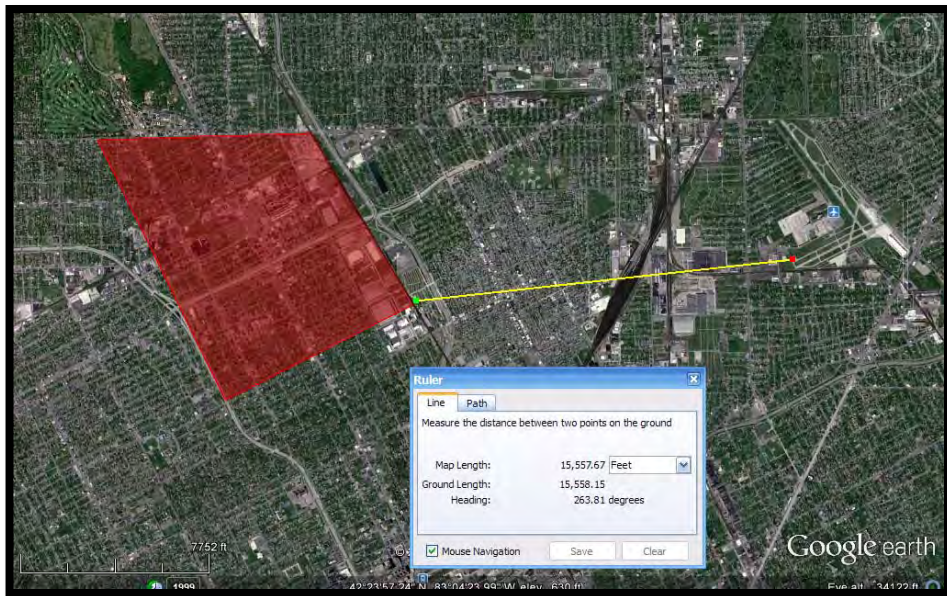
Red area is City of Highland Park  
Blue area is the area of Wayne county reporting to be not in attainment for PM2.5



# Appendix F: Distance from Detroit City Airport to NSP2 target area

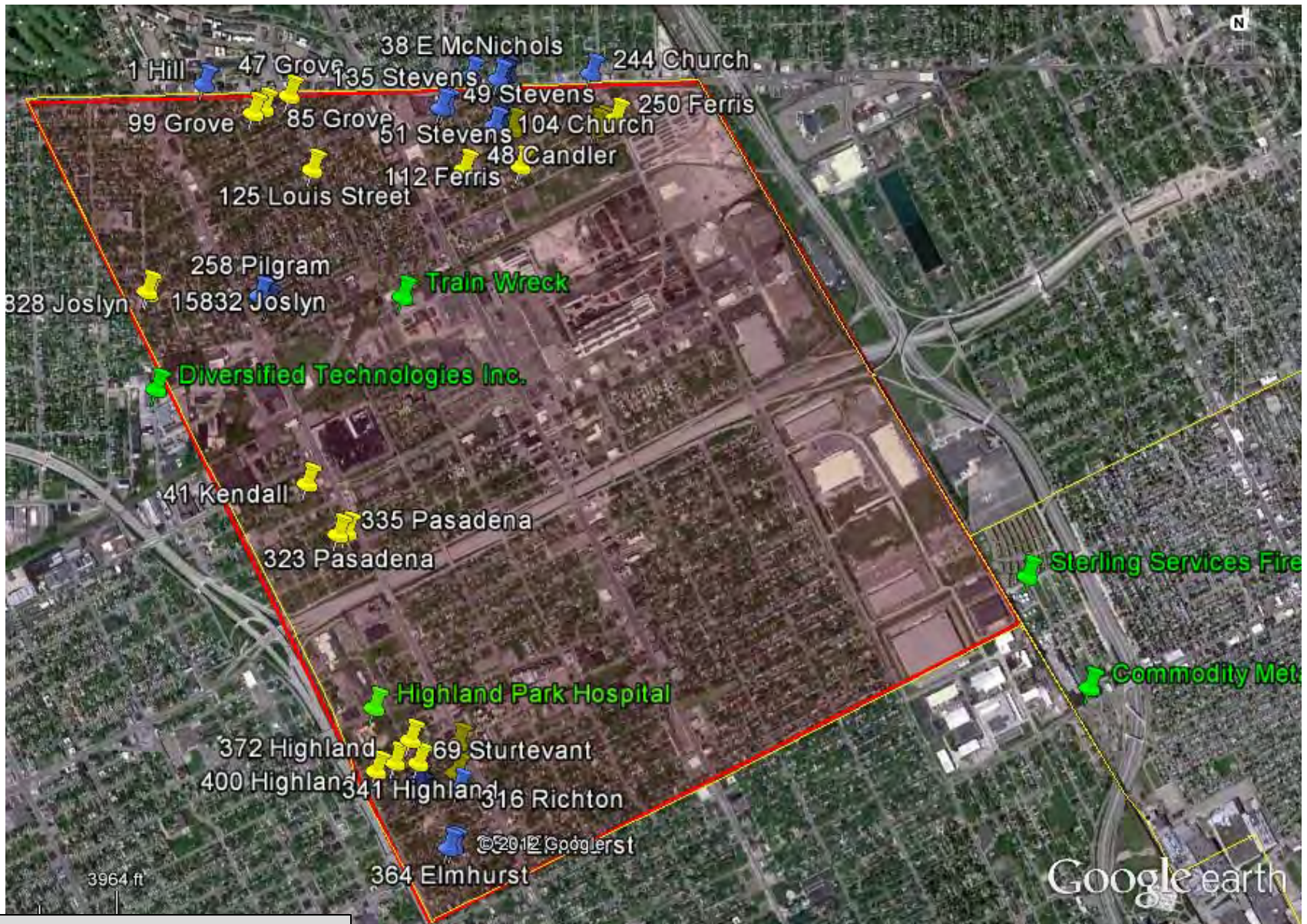
Runway 1: 15,557 feet

Runway 2: 19,665 feet





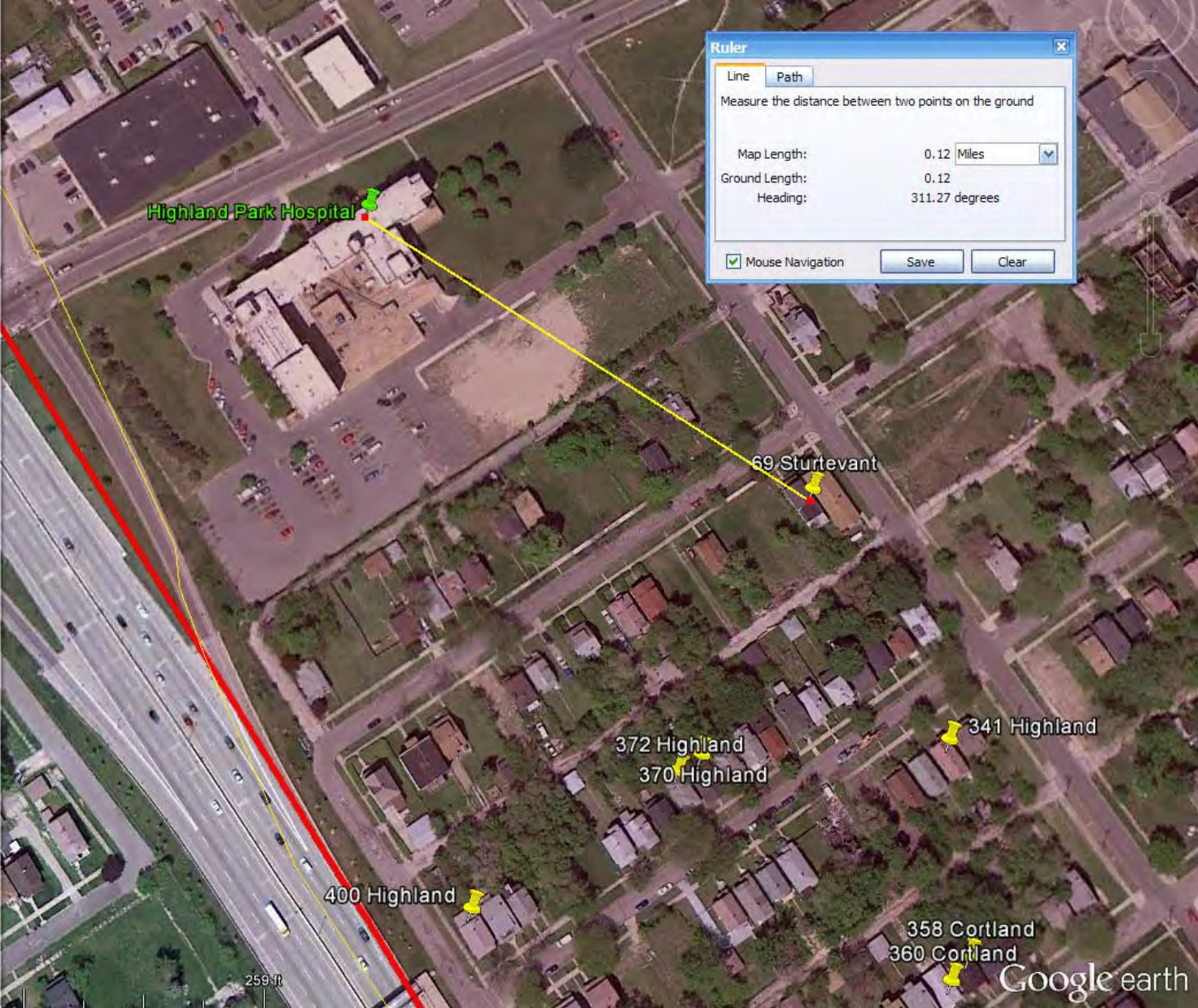
# Appendix G-1: Location of CERCLIS Sites



Yellow and Blue Pins – NSP2 Properties  
Green pins – CERCLIS Sites

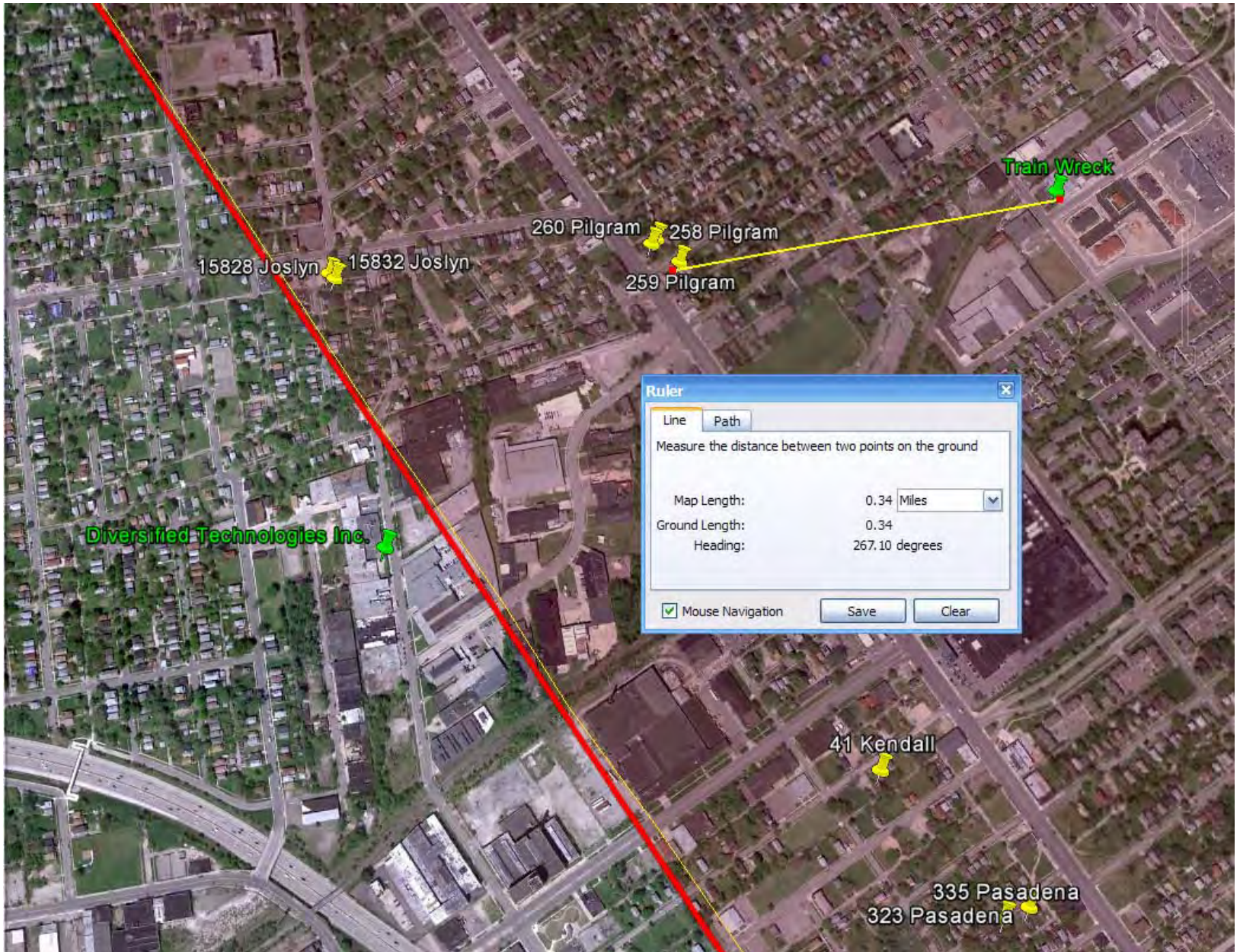


# Appendix G-2: CERCLIS Site – Highland Park Hospital to NSP2 Site



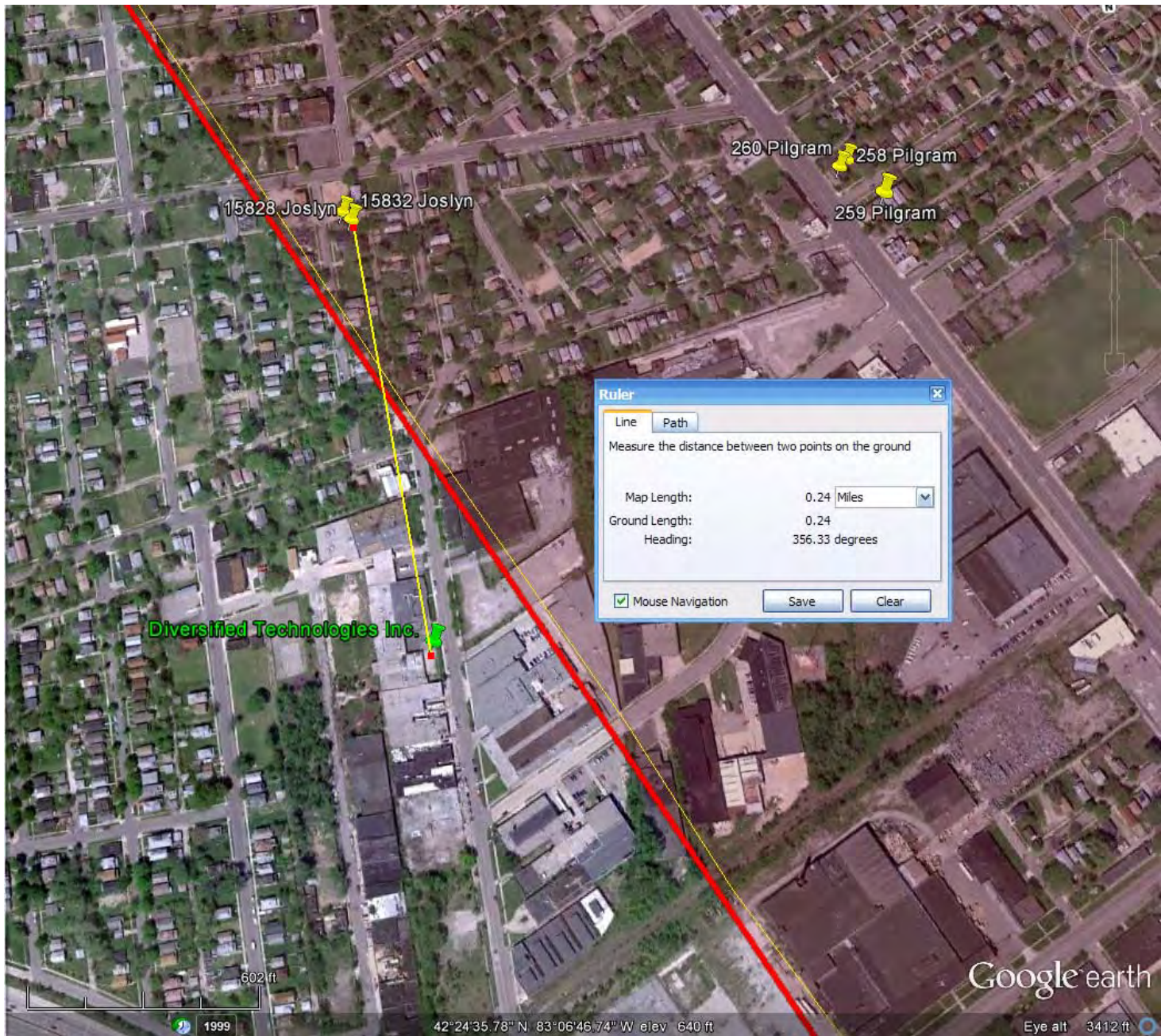


# Appendix G-3: CERCLIS Site – Train Wreck to NSP2 Site





# Appendix G-4: CERCLIS Site – Diversified Technologies Inc to NSP2 site



## Appendix G-5: CERCLIS Sites

Appendix G-5: CERCLIS Sites in Highland Park, Michigan

The CERCLIS Public Access Database contains a selected set of "non-enforcement confidential" information and is updated by the regions every 90 days. The data describes what has happened at Superfund sites prior to this quarter (updated quarterly). This database includes lists of involved parties (other Federal Agencies, states, and tribes), Human Exposure and Ground Water Migration, and Site Wide Ready for Reuse, Construction Completion, and Final Assessment Decision (GPRA-like measures) for fund lead sites. Other information that is included has been included only as a service to allow public evaluations utilizing this data. Independent Quality Assessments may be made of this data by reviewing the QAPP provided by this link.(PDF 29pp, 124K)

**Query Search Results**

April 6, 2012 - 03:54:07 PM

**Search Criteria:**

Active vs. Archived: [Active What are active and archived sites?](#)  
 City: *HIGHLAND PARK*  
 County: *WAYNE*  
 State(s): *Michigan*

Found **3** site(s) that match above search criteria:

EPA ID	Site Name	City	County	State	Non-NPL Status Code	Non-NPL Status Date	NPL Status Code
MIN000510200	HIGHLAND PARK HOSPITAL	HIGHLAND PARK	WAYNE	MI	RO	5/15/2007	N
MIN000510484	JOHN R STREET SITE	HIGHLAND PARK	WAYNE	MI	RO	7/7/2010	N
MIN000508090	TRAIN WRECK, HIGHLAND PARK	HIGHLAND PARK	WAYNE	MI	RO	10/13/2000	N



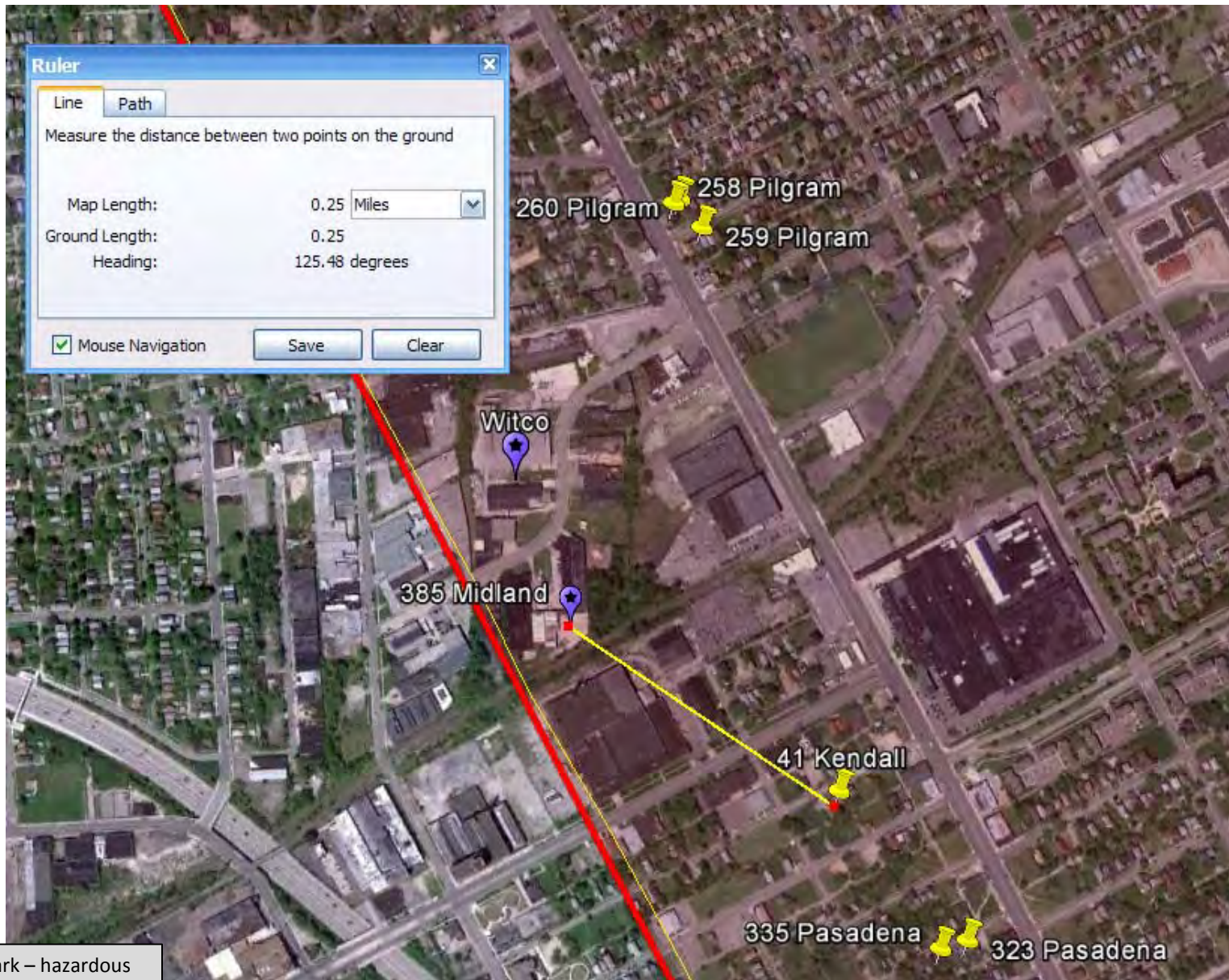
# Appendix H-1: Location of Part 201 sites in remediation



City of Highland Park shaded in red  
Purple placemarks – Part 201 sites  
Circled Placemarks - identified hazardous Part 201 sites



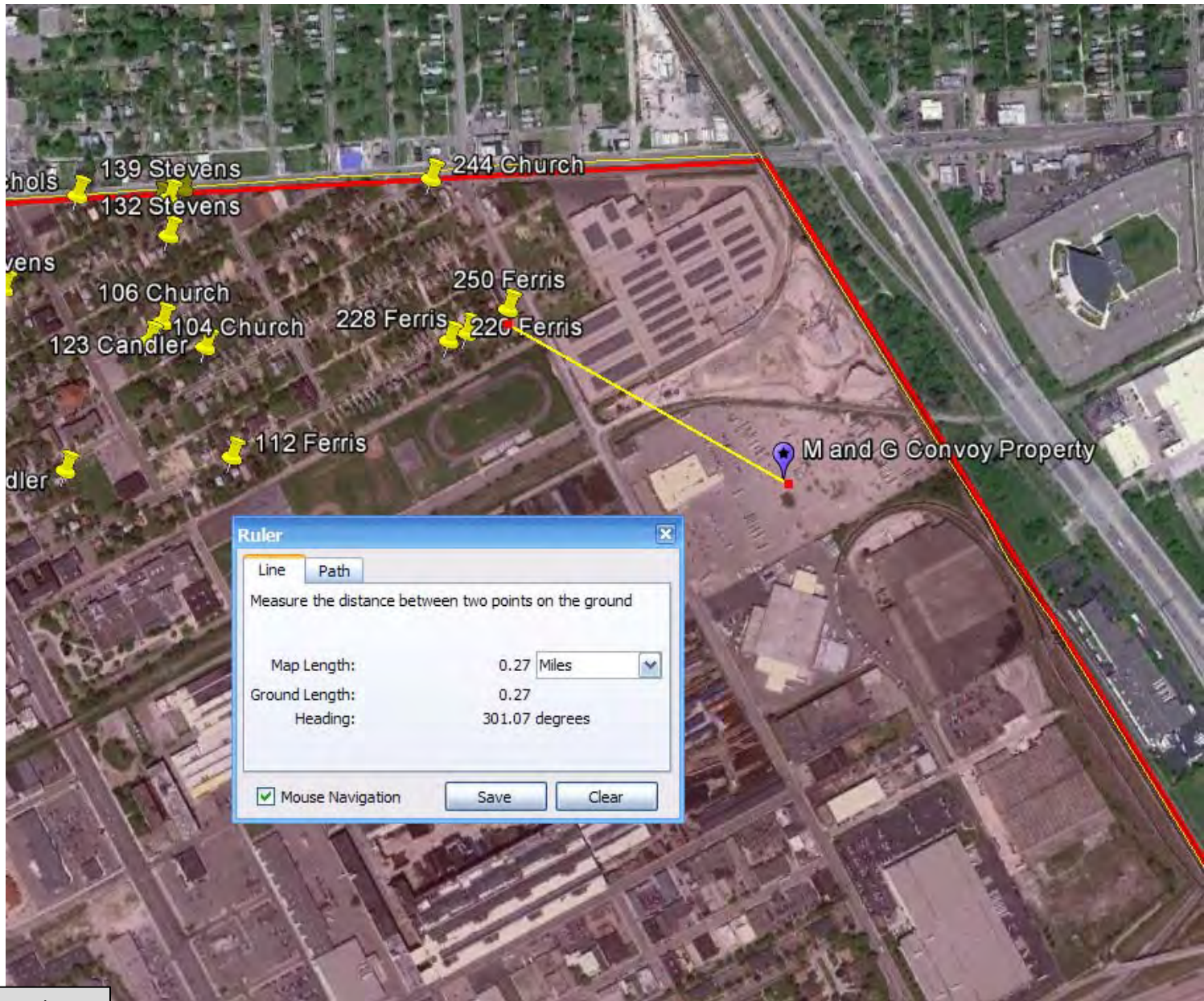
## Appendix H-2: Proximity of property to 385 Midland Site



Purple Placemark – hazardous Part 201 site  
Yellow Pins – NSP2 property



# Appendix H-3: Proximity of property to M&G Convoy Property



Purple Placemark – hazardous Part 201 site  
Yellow Pins – NSP2 property

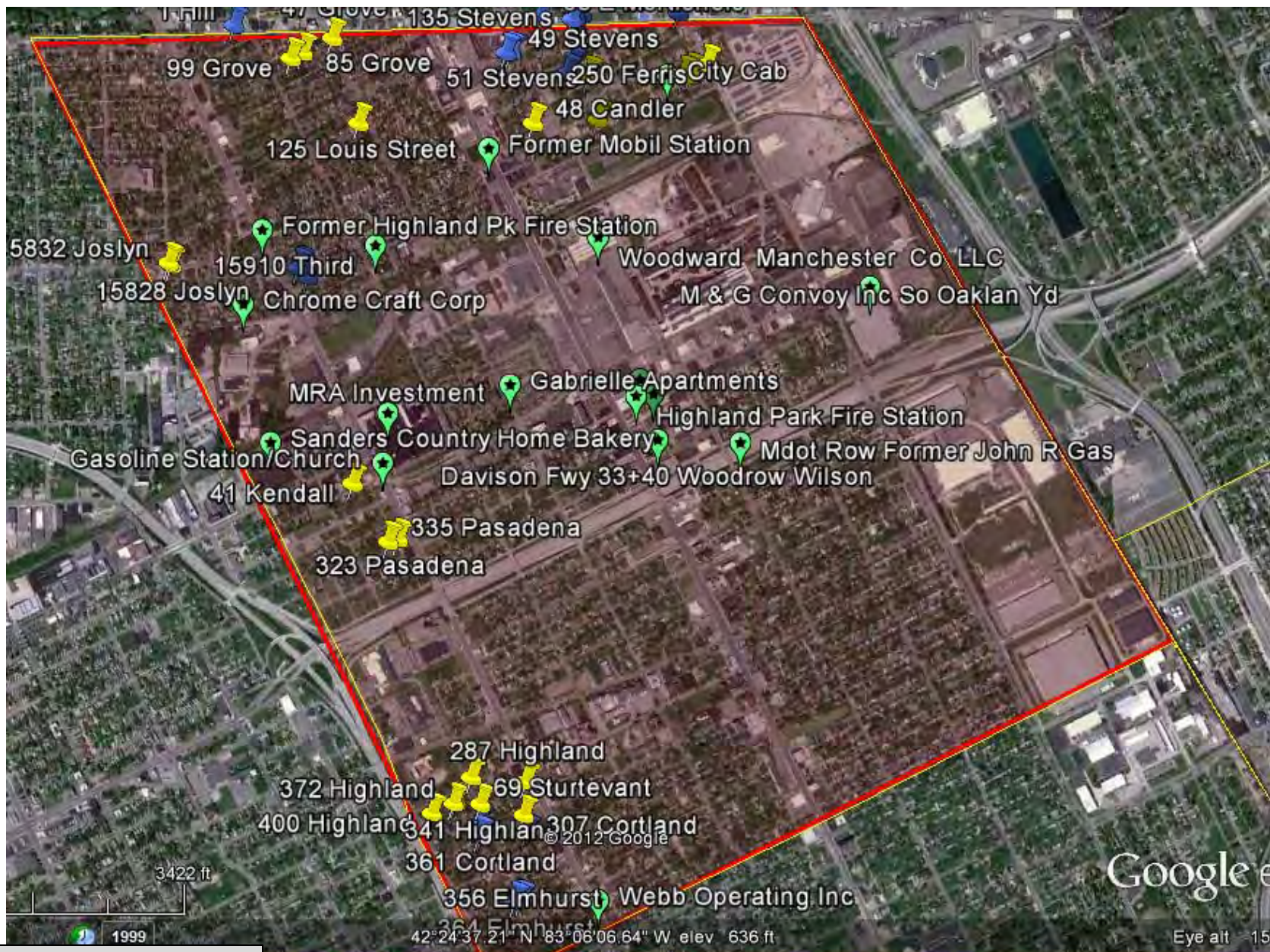
## Appendix H-4: Part 201 Sites

Appendix H-5: Part 201 Sites in Highland Park

Site ID	Site Name	Address	City	Zip Code	County Name	Source	Pollutan	Score (out)	Score Da	Overall Status
'82000175'	Witco	364 Midland Avenue	Highland Park	48203	Wayne	Chemicals and Allied Products	Ni	31	33121	Remedial Action in Progress (may incl. use restrictions, O&M and/or monitoring)
'82001420'	M and G Convoy Pro	15100 Oakland Avenue	Highland Park	48203	Wayne	General Warehousing & Storage	Pb	16	33843	Interim Response in progress
'82001558'	385 Midland	385 Midland	Highland Park		Wayne	Plastics Products		21	38114	Inactive - no actions taken to address contamination
'82001632'	Sears Former	15001 Woodward Avenue	Highland Park		Wayne	Department Stores		33	38119	Interim Response conducted - No further activities anticipated
'82001633'	Woodward Avenue,	Woodward and Hamilton Str	Highland Park		Wayne					Interim Response conducted - No further activities anticipated
'82001637'	11 Moss Avenue	11 Moss Avenue	Highland Park		Wayne					Interim Response conducted - No further activities anticipated
'82001761'	Highland Park Hospit	369 Glendale	Highland Park	48203	Wayne	Electric Gas & Sanitary Serv		19	38050	Interim Response conducted
'82002479'	Highland Park Soil Pil	Second and Pasedena	Highland Park	48203	Wayne					Interim Response conducted - No further activities anticipated



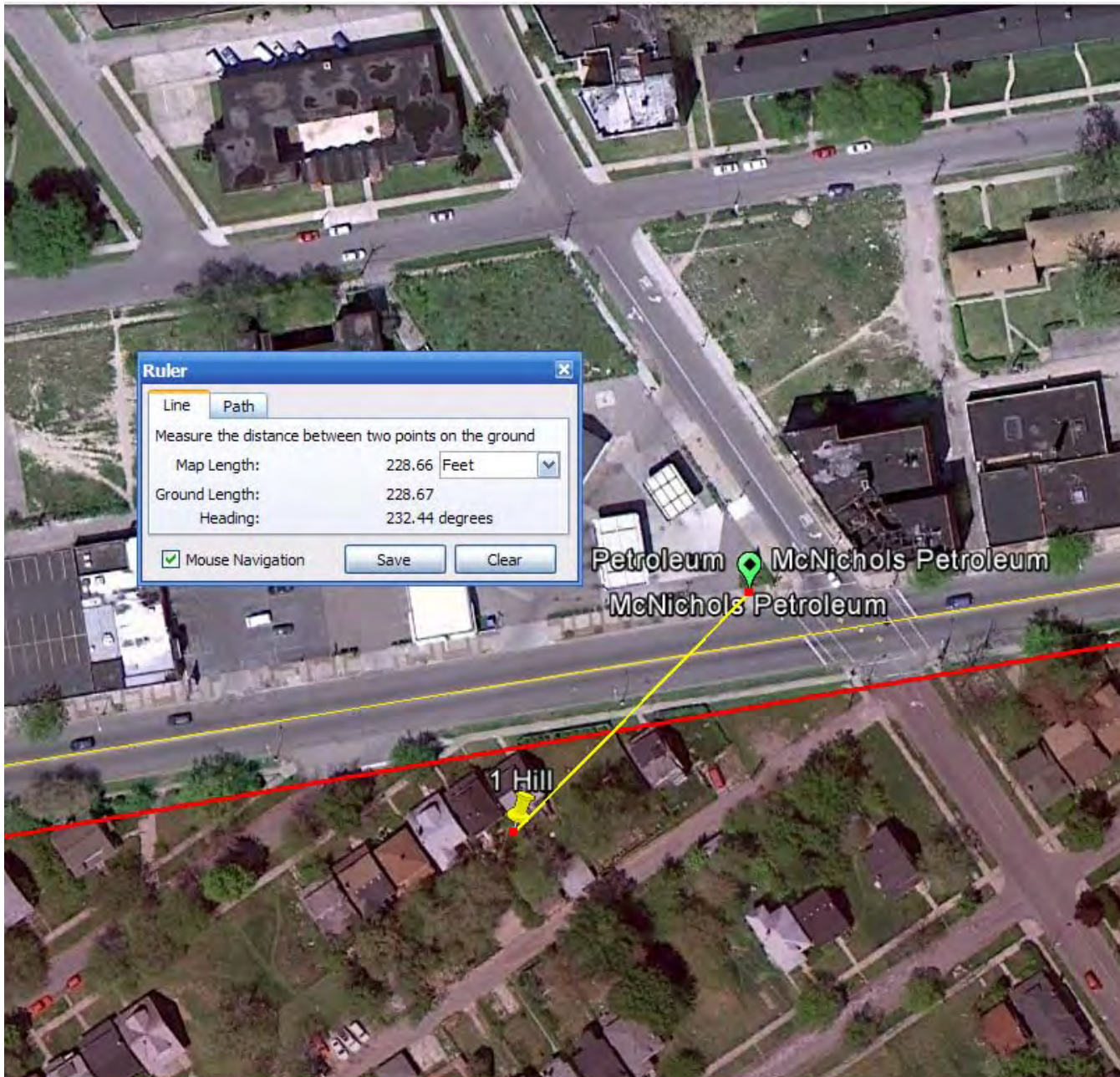
# Appendix I-1: Leaking Underground Storage tanks in and around NSP2 Project Target Area



Green Placemarks– LUST Sites  
 Yellow and blue Pins – NSP2 property

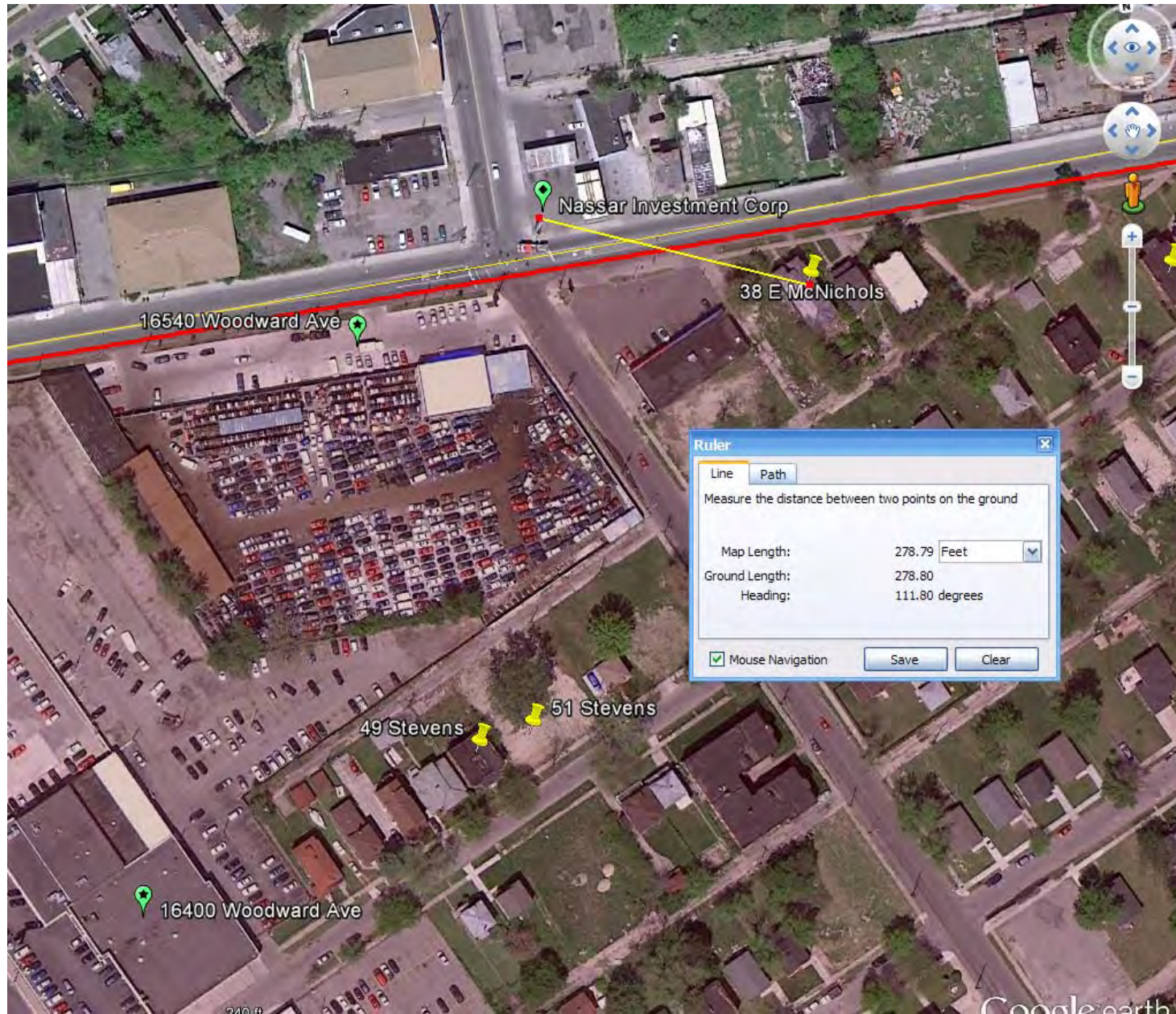


# Appendix I-2: LUST Site in relation to 1 Hill





# Appendix I-3: LUST Site in relation to 38 E McNichols



## Appendix I: LUST Sites

Appendix I-6: Michigan DEQ Database of Open LUST sites

Release Details					Facility Details					
LUST Site Name	Leak #	Release Date	Substance Released	Release Status	ID	Facility Name	Address	City	Zip	County
Chrome Craft Corp.	C-0690-94	Jul 1 1994	Unknown	Open	00038154	Chrome Craft Corp	318 Midland St	Highland P.	48203-373	Wayne
City Of Highland Pk - Fi	C-1380-99	Dec 28 199	Unknown	Open	00014568	Former H.p City Hall	30 Gerald St	Highland P.	48203-311	Wayne
City Of Highland Park - C-	C-0457-00	May 19 200	Unknown	Open	00007159	Former Highland Pk Fire S	16099 HAMILTON	HIGHLAND	48203	Wayne
City Of Highland Pk - P C-	C-0099-00	Jan 31 200	Unknown	Open	00014570	Former Police Station	25 Gerald St	Highland P.	48203-311	Wayne
City Of Highland Pk - P C-	C-1381-99	Dec 28 199	Unknown	Open	00014570	Former Police Station	25 Gerald St	Highland P.	48203-311	Wayne
City Of Highland Pk - P C-	C-1390-99	Dec 31 199	Unknown	Open	00014571	Highland Park Fire Station	20 Gerald St	Highland P.	48203-311	Wayne
Former Gasoline Statio	C-0162-08	Nov 15 200	Gasoline,Gasoline	Open	00042149	Gasoline Station/Church	14015 Hamilton Ave	Highland P.	48275	Wayne
Former Mobil Station	C-0347-03	Mar 27 200	Gasoline,Gasoline,Used Oil,Ot	Open	50005306	Former Mobil Station	16001 Woodward & Pilgram	Highland P.	60494	Wayne
Gabrielle Ltd Dividend I	C-0074-93	Jan 14 199	Diesel	Open	00037168	Gabrielle Apartments	14201 Second Ave	Highland P.	48203-371	Wayne
Webb operating Inc	C-0203-06	Jun 2 200	Gasoline,Gasoline,Gasoline,Ke	Open	00012813	Webb Operating Inc	11731 Hamilton Ave	Highland P.	48203-341	Wayne
Webb Operating	C-0145-10	Oct 12 201	Gasoline,Gasoline	Open	00012813	Webb Operating Inc	11731 Hamilton Ave	Highland P.	48203-341	Wayne
M & G Convoy Inc So C	C-1139-99	Nov 5 199	Unknown	Open	00007542	M & G Convoy Inc So Oak	13900 OAKLAND AVE	HIGHLAND	48302	Wayne
MDOT Row Former Jol	C-0331-96	May 23 199	Gasoline	Open	00039039	Mdot Row Former John R	13400 John R Rd. @ Auburndale	Highland P.	48075	Wayne
Helm Inc	C-0135-97	Mar 12 199	Unknown	Open	00003772	MRA Investment	14310 Hamilton Ave	Highland P.	48203-377	Wayne
Helm Inc	C-0072-97	Feb 12 199	Kerosene	Open	00003772	MRA Investment	14310 Hamilton Ave	Highland P.	48203-377	Wayne
Helm Inc.	C-1457-94	Oct 12 199	Other	Closed	00003772	MRA Investment	14310 Hamilton Ave	Highland P.	48203-377	Wayne
Detroit Tigers Baseball	C-0544-98	Jun 26 199	Unknown	Open	50001232	City Cab	206 Ferris St	Highland P.	48203-291	Wayne
City Cab	C-1158-90	Jun 27 1990		Open	50001232	City Cab	206 Ferris St	Highland P.	48203-291	Wayne
Davison Fwy 3340 Woc	C-0500-97	Jul 1 1997	Unknown,Unknown	Open	50002068	Davison Fwy 33+40 Wood	NW Corner Davison Fwy/Woodrow	Highland P.	99999	Wayne
Former Hamilton Rd G	C-1004-96	Dec 5 199	Unknown	Open	00039242	Former Hamilton Rd Gas	13519 Hamilton Rd	Highland P.	48203-305	Wayne
Former Hamilton Rd G	C-0720-96	Sep 16 199	Unknown	Open	00039242	Former Hamilton Rd Gas	13519 Hamilton Rd	Highland P.	48203-305	Wayne
Woodward Gas (forme	C-0721-96	Sep 16 199	Diesel	Open	50001920	Former Woodward Rd Ga	79 + 43 Woodward Rd	Highland P.	99999	Wayne
Sanders Country Home	C-1158-91	Jun 12 1991		Open	00010035	Sanders Country Home B	100 Oakman Blvd	Highland P.	48203-305	Wayne
Sanders Country Home	C-1315-94	Nov 1 199	Used Oil	Open	00010035	Sanders Country Home B	100 Oakman Blvd	Highland P.	48203-305	Wayne
Sanders Country Home	C-1297-94	Oct 31 199	Gasoline	Open	00010035	Sanders Country Home B	100 Oakman Blvd	Highland P.	48203-305	Wayne
Rayford Jackson	C-0292-05	Nov 10 200	Gasoline,Gasoline,Gasoline,W	Open	00038620	Vacant Lot	15910 Third	Highland P.	48909	Wayne
Woodward Mancheste	C-0051-03	Feb 4 200	Unknown,Unknown,Unknown	Open	00041299	Woodward Manchester C	91 Manchester	Highland P.	48203	Wayne



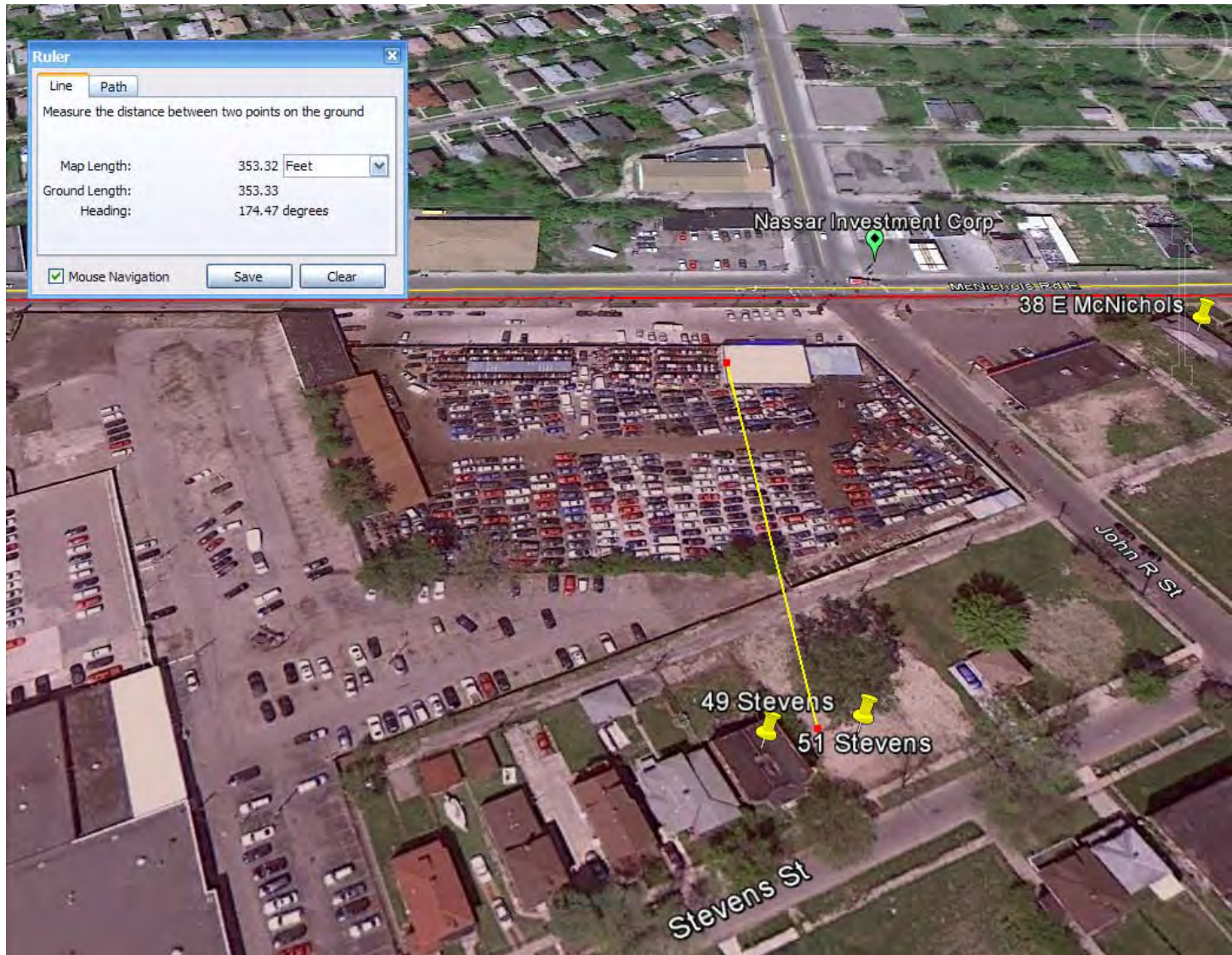
Appendix I-5: LUST Site Database, Highland Park, Michigan

Facility Details						Tank Details					
BP	12551 Woodward/Glendale	Highland Park	48073	Wayne	Currently In Use	Gasoline	Inventory Control, Automatic Tank Gauging	Automatic Line Leak Detectors	Fiberglass Reinforced Plastic	Pressure	Epoxy Coated Steel
BP	12551 Woodward/Glendale	Highland Park	48073	Wayne	Currently In Use	Gasoline	Inventory Control, Automatic Tank Gauging	Automatic Line Leak Detectors	Fiberglass Reinforced Plastic	Pressure	Epoxy Coated Steel
Hamilton Fuel Stop Inc	12803 Hamilton	Highland Park	48203-3216	Wayne	Currently In Use	Gasohol	Inventory Control, Automatic Tank Gauging	Automatic Line Leak Detectors, Line Tightness Testing	Double Walled	Pressure	Single Walled, Fiberglass Reinforced Plastic
Hamilton Fuel Stop Inc	12803 Hamilton	Highland Park	48203-3216	Wayne	Currently In Use	Gasohol	Inventory Control, Automatic Tank Gauging	Automatic Line Leak Detectors, Line Tightness Testing	Double Walled	Pressure	Single-alled, Fiberglass Reinforced Plastic
Hamilton Fuel Stop Inc	12803 Hamilton	Highland Park	48203-3216	Wayne	Currently In Use	Diesel	Inventory Control, Automatic Tank Gauging	Automatic Line Leak Detectors, Line Tightness Testing	Double Walled	Pressure	Single Walled, Fiberglass Reinforced Plastic
Hamilton Fuel Stop Inc	12803 Hamilton	Highland Park	48203-3216	Wayne	Currently In Use	Kerosene	Inventory Control, Automatic Tank Gauging	Automatic Line Leak Detectors, Line Tightness Testing	Double Walled	Pressure	Single Walled, Fiberglass Reinforced Plastic
Bill Snethkamp Chrysler-plymouth	16400 Woodward Ave	Highland Park	48203-2818	Wayne	Currently In Use	Used Oil, HYDRAULIC OIL			Galvanized Steel		Asphalt Coated or Bare Steel
Bill Snethkamp Chrysler-plymouth	16400 Woodward Ave	Highland Park	48203-2818	Wayne	Currently In Use	HYDRAULIC OIL			Galvanized Steel		Asphalt Coated or Bare Steel
Bill Snethkamp Chrysler-plymouth	16400 Woodward Ave	Highland Park	48203-2818	Wayne	Currently In Use	HYDRAULIC OIL			Galvanized Steel		Asphalt Coated or Bare Steel
Bill Snethkamp Chrysler-plymouth	16400 Woodward Ave	Highland Park	48203-2818	Wayne	Currently In Use	HYDRAULIC OIL			Galvanized Steel		Asphalt Coated or Bare Steel
Eastown Distributors Company	14400 Oakland St	Highland Park	48203-2900	Wayne	Currently In Use	Gasoline	Inventory Control, Automatic Tank Gauging		Fiberglass Reinforced Plastic	Suction: No Valve At Tank	Fiberglass Reinforced Plastic
Woodward & Six Mile Food Mart	14400 Oakland St	Highland Park	48203-2900	Wayne	Currently In Use	Diesel	Inventory Control, Automatic Tank Gauging		Fiberglass Reinforced Plastic	Suction: No Valve At Tank	Fiberglass Reinforced Plastic
Eastown Distributors Company	14400 Oakland St	Highland Park	48203-2900	Wayne	Currently In Use	Diesel	Inventory Control, Automatic Tank Gauging		Fiberglass Reinforced Plastic	Suction: No Valve At Tank, Suction: No Valve At Tank	Fiberglass Reinforced Plastic
Sunoco/Burger King	13300 Woodward Ave	Highland Park	48203-3611	Wayne	Currently In Use	Gasoline	Automatic Tank Gauging, Inter Monitoring Double Walled Tank	Interstitial Monitoring Double Walled Piping	Double Walled, GEOFLEX	Pressure	Composite(Steel w/Fiberglass), Double Walled
Sunoco/Burger King	13300 Woodward Ave	Highland Park	48203-3611	Wayne	Currently In Use	Gasoline	Automatic Tank Gauging, Inter Monitoring Double Walled Tank	Interstitial Monitoring Double Walled Piping	Double Walled, GEOFLEX	Pressure	Composite(Steel w/Fiberglass), Double Walled
Sunoco/Burger King	13300 Woodward Ave	Highland Park	48203-3611	Wayne	Currently In Use	Diesel	Automatic Tank Gauging, Inter Monitoring Double Walled Tank	Interstitial Monitoring Double Walled Piping	Double Walled, GEOFLEX	Pressure	Composite(Steel w/Fiberglass), Double Walled
Highland PK Makki Investment Co	12524 Woodward Ave	Highland Park	48203-3314	Wayne	Currently In Use	Gasoline	Inventory Control, Automatic Tank Gauging	Automatic Line Leak Detectors, Line Tightness Testing	Fiberglass Reinforced Plastic	Pressure	Fiberglass Reinforced Plastic
Highland PK Makki Investment Co	12524 Woodward Ave	Highland Park	48203-3314	Wayne	Currently In Use	Gasoline	Inventory Control, Automatic Tank Gauging	Automatic Line Leak Detectors, Line Tightness Testing	Fiberglass Reinforced Plastic	Pressure	Fiberglass Reinforced Plastic
Highland PK Makki Investment Co	12524 Woodward Ave	Highland Park	48203-3314	Wayne	Currently In Use	Gasoline	Inventory Control, Automatic Tank Gauging	Automatic Line Leak Detectors, Line Tightness Testing	Fiberglass Reinforced Plastic	Pressure	Fiberglass Reinforced Plastic
Webb Operating Inc	11731 Hamilton Ave	Highland Park	48203-3417	Wayne	Currently In Use	Gasoline	Automatic Tank Gauging	Interstitial Monitoring Double Walled Piping	Flexible Piping	Pressure	Fiberglass Reinforced Plastic, Double Walled

Appendix I-5: LUST Site Database, Highland Park, Michigan

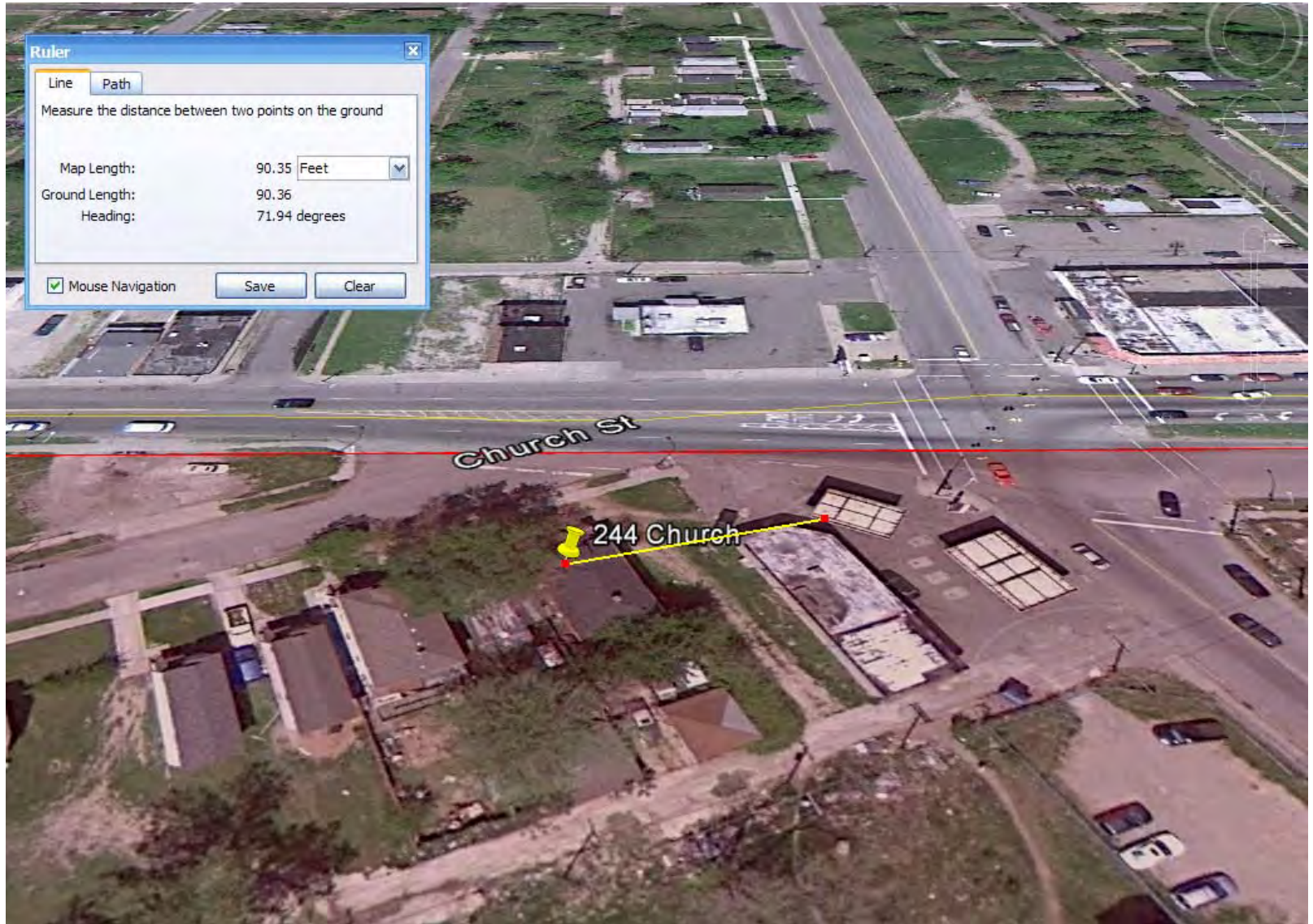
H & R Mart	14321 Hamilton Ave	Highland Park	48203	Wayne	Currently In Use	Gasoline,Diesel,Kerosene	Automatic Tank Gauging,Inter Monitoring Double Walled Tank	Automatic Line Leak Detectors,Interstitial Monitoring Double Walled Piping	Flexible Piping	Pressure	Double Walled
H & R Mart	14321 Hamilton Ave	Highland Park	48203	Wayne	Currently In Use	Gasoline	Automatic Tank Gauging,Inter Monitoring Double Walled Tank	Automatic Line Leak Detectors,Interstitial Monitoring Double Walled Piping	Flexible Piping	Pressure	Double Walled
M & H Service Station	16251 Oakland St	Highland Park	48203-2861	Wayne	Currently In Use	Gasoline	Inventory Control, Automatic Tank Gauging	Automatic Line Leak Detectors, Line Tightness Testing	Fiberglass Reinforced Plastic	Pressure	Lined Interior
M & H Service Station	16251 Oakland St	Highland Park	48203-2861	Wayne	Currently In Use	Gasoline	Inventory Control, Automatic Tank Gauging	Automatic Line Leak Detectors, Line Tightness Testing	Fiberglass Reinforced Plastic	Pressure	Lined Interior
M & H Service Station	16251 Oakland St	Highland Park	48203-2861	Wayne	Currently In Use	Diesel	Inventory Control, Automatic Tank Gauging	Automatic Line Leak Detectors, Line Tightness Testing	Fiberglass Reinforced Plastic	Pressure	Lined Interior
M & H Service Station	16251 Oakland St	Highland Park	48203-2861	Wayne	Currently In Use	Gasoline	Inventory Control, Automatic Tank Gauging	Automatic Line Leak Detectors, Line Tightness Testing	Fiberglass Reinforced Plastic	Pressure	Lined Interior
M & H Service Station	16251 Oakland St	Highland Park	48203-2861	Wayne	Currently In Use	Kerosene	Inventory Control, Automatic Tank Gauging	Automatic Line Leak Detectors, Line Tightness Testing	Fiberglass Reinforced Plastic	Pressure	ZORN TK, Cathodically Protected Steel
One Stop Petro Mart #1056	17013 Hamilton Ave	Highland Park	48203-2573	Wayne	Currently In Use	Kerosene	Automatic Tank Gauging,Inventory Control	Automatic Line Leak Detectors,Line Tightness Testing	Fiberglass reinforced plastic	Pressure	Cathodically Protected Steel
One Stop Petro Mart #1056	17013 Hamilton Ave	Highland Park	48203-2573	Wayne	Currently In Use	Gasoline	Automatic Tank Gauging,Inventory Control	Automatic Line Leak Detectors,Line Tightness Testing	Fiberglass reinforced plastic	Pressure	Cathodically Protected Steel
One Stop Petro Mart #1056	17013 Hamilton Ave	Highland Park	48203-2573	Wayne	Currently In Use	Gasoline	Automatic Tank Gauging,Inventory Control	Automatic Line Leak Detectors,Line Tightness Testing	Fiberglass reinforced plastic	Pressure	Cathodically Protected Steel
One Stop Petro Mart #1056	17013 Hamilton Ave	Highland Park	48203-2573	Wayne	Currently In Use	Gasoline	Automatic Tank Gauging,Inventory Control	Automatic Line Leak Detectors,Line Tightness Testing	Fiberglass reinforced plastic	Pressure	Cathodically Protected Steel
Highland Park Community High	15900 Woodward Ave	Highland Park	48203-2948	Wayne	Currently In Use	Diesel			Unknown		Asphalt Coated or Bare Steel
Highland Park Community High	15900 Woodward Ave	Highland Park	48203-2948	Wayne	Currently In Use	Diesel			Unknown		Asphalt Coated or Bare Steel
Woodwood & Midland Mini Mart Inc	15903 Woodward Ave	Highland Park	48203-2947	Wayne	Currently In Use	Gasoline, Dual Compartmentalized	Inventory Control, Automatic Tank Gauging	Automatic Line Leak Detectors, Line Tightness Testing	Fiberglass Reinforced Plastic, Double Walled	Pressure	Fiberglass Reinforced Plastic
Woodwood & Midland Mini Mart Inc	15903 Woodward Ave	Highland Park	48203-2947	Wayne	Currently In Use	Kerosene	Inventory Control, Automatic Tank Gauging	Automatic Line Leak Detectors	OMNIFLEX, Fiberglass Reinforced Plastic, Double Walled	Suction: No Valve At Tank	Fiberglass Reinforced Plastic
Woodward & Six Mile Food Mart	16540 Woodward Ave	Highland Park	48203-2804	Wayne	Currently In Use	Gasoline, Diesel	Inventory Control, Automatic Tank Gauging	Automatic Line Leak Detectors, Line Tightness Testing	Double Walled	Pressure	Fiberglass Reinforced Plastic
MI	48203	USA			POINT						
MI	48185-3173	USA		( ) -	POINT						

# I-4 Potentially Hazardous Operation – Holbrook Tire and Auto Repair adjacent to 49 and 51 Stevens

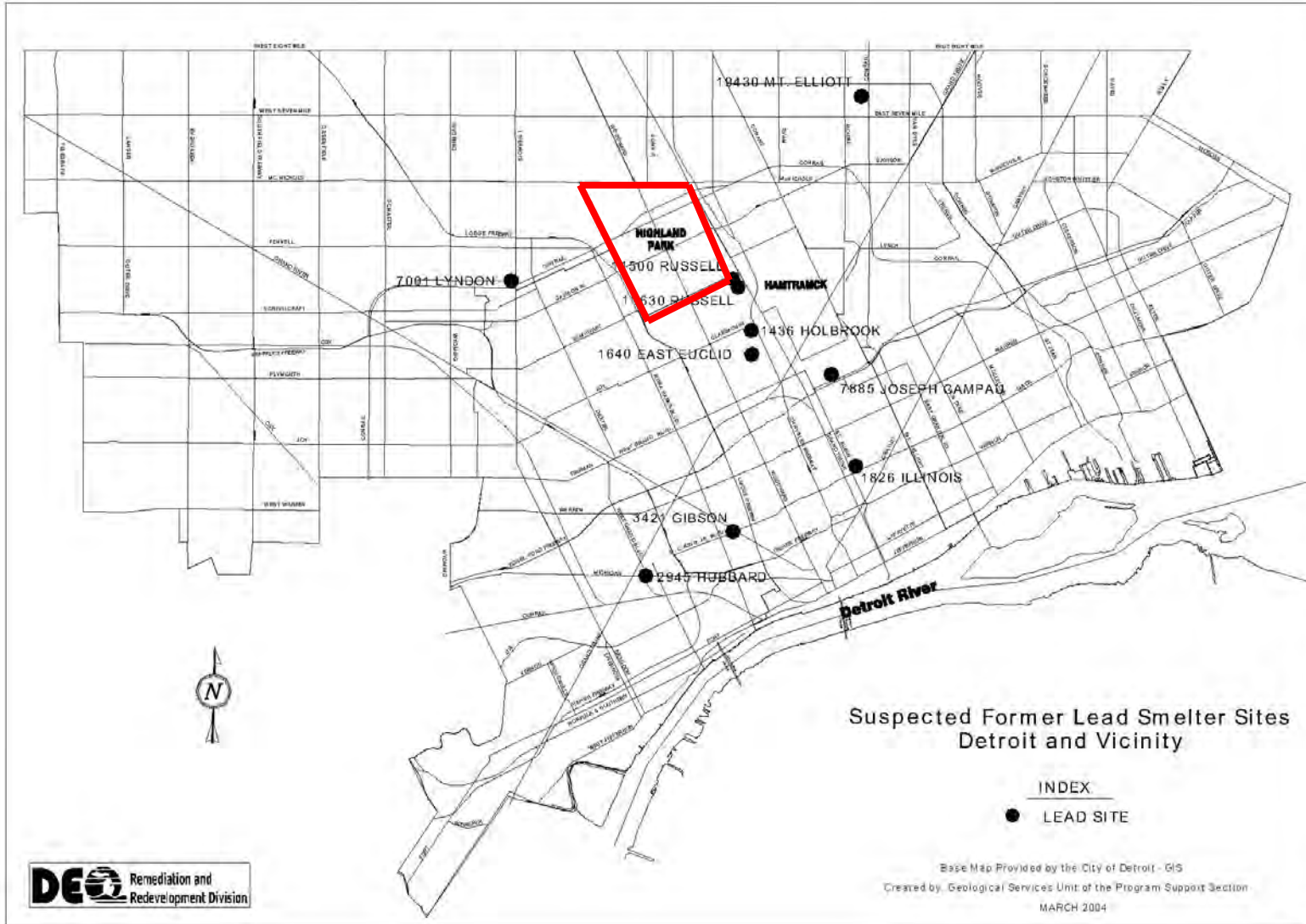




# Appendix I-5: Potentially Hazardous Operation – Fire Bird Gas Station in relation to 244 Church

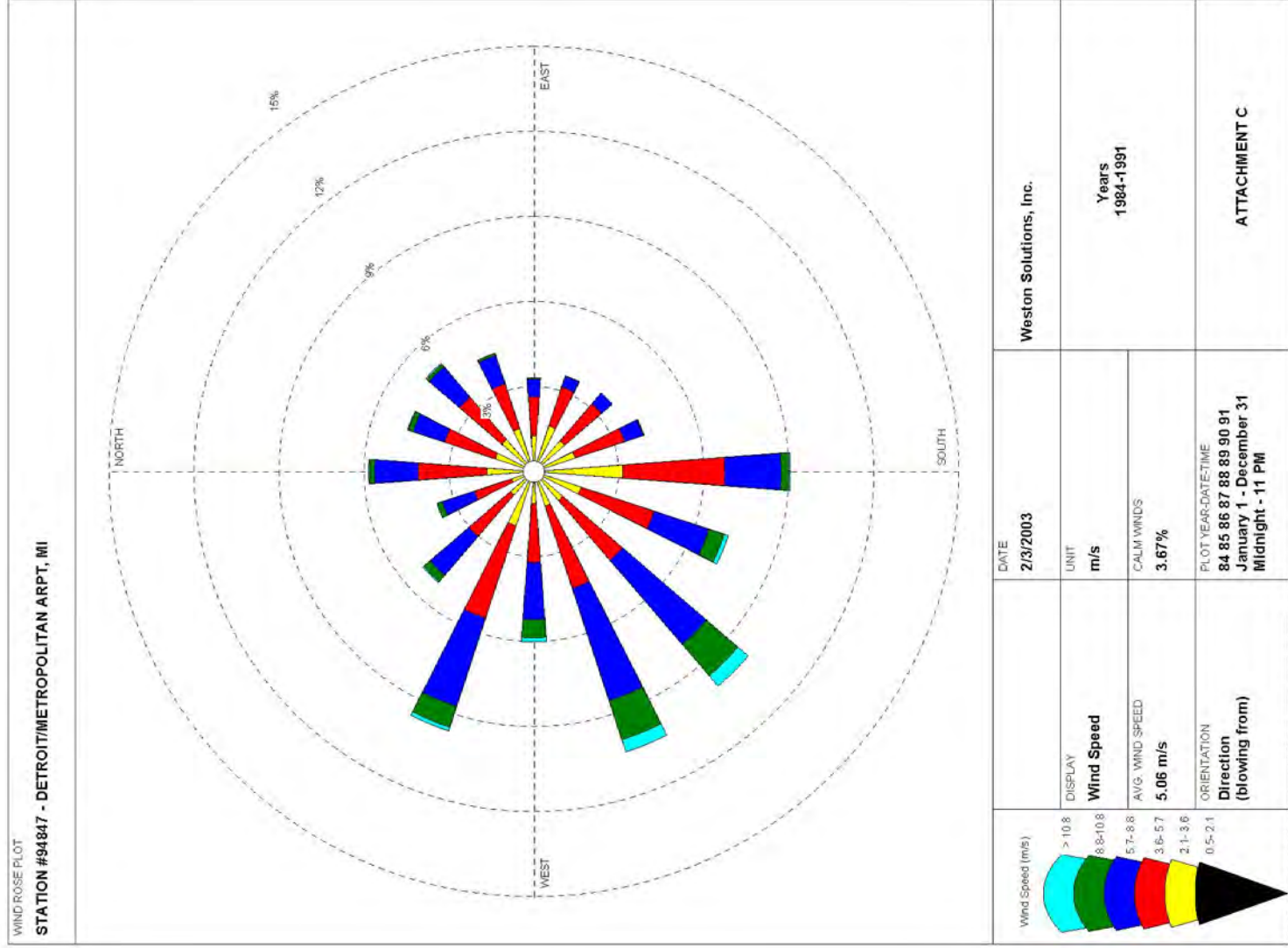


# Appendix J-1: Locations of Lead Smelters, Wayne County

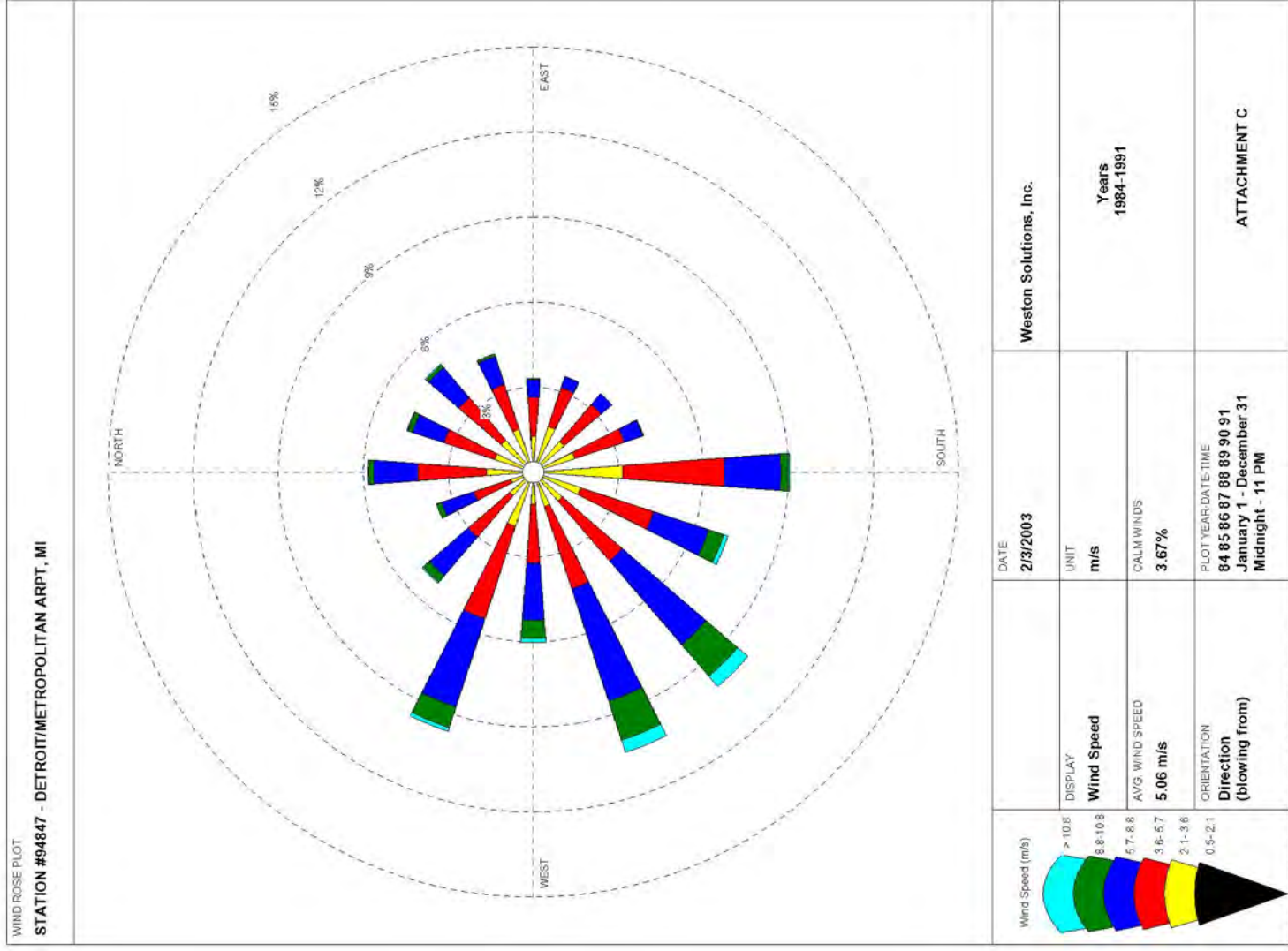




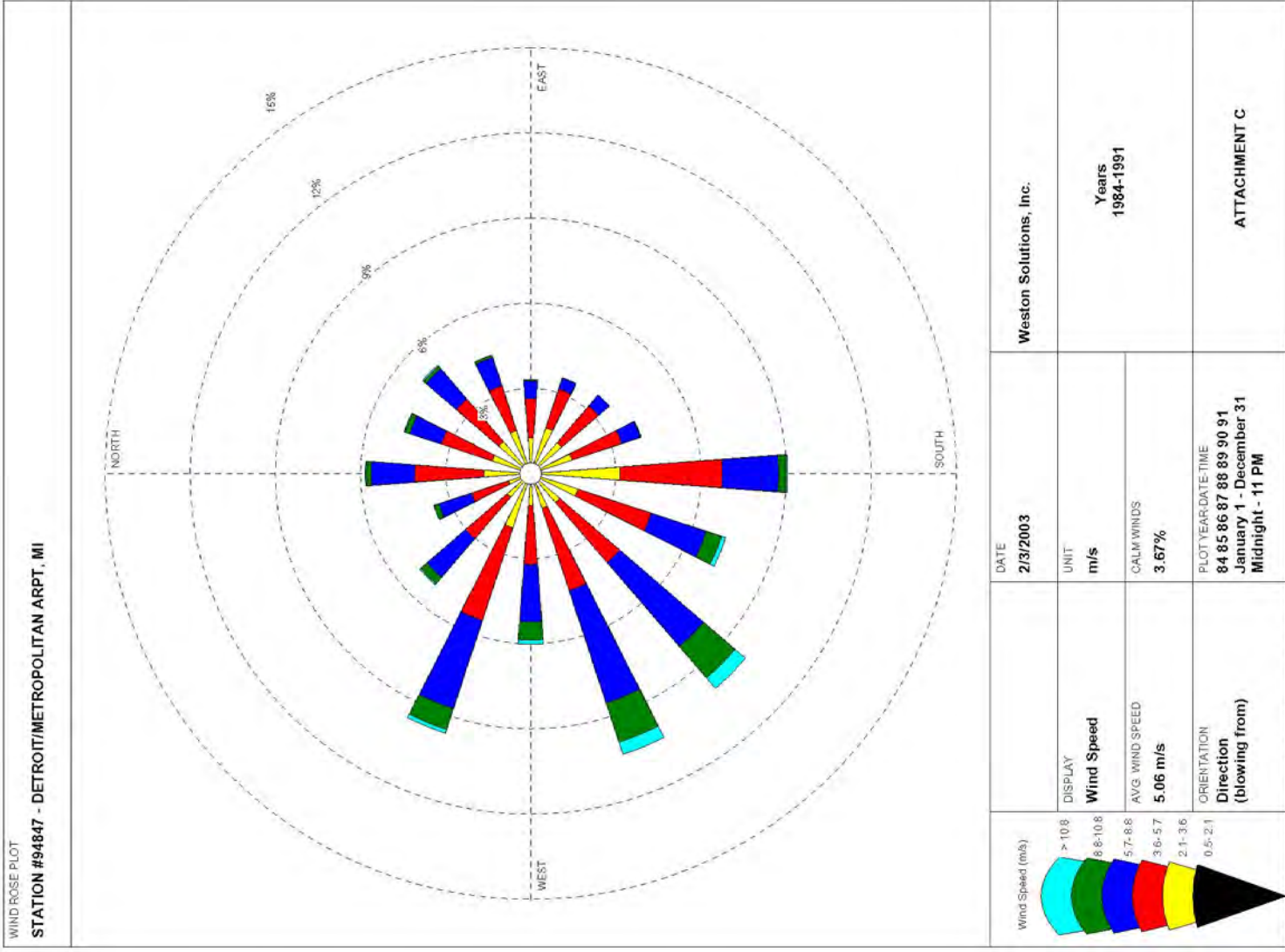
# Appendix J-2: Wind Rose Plot for Federated Metals Division Smelter



# Appendix J-3: Wind Rose Plot for Continental Metal Company

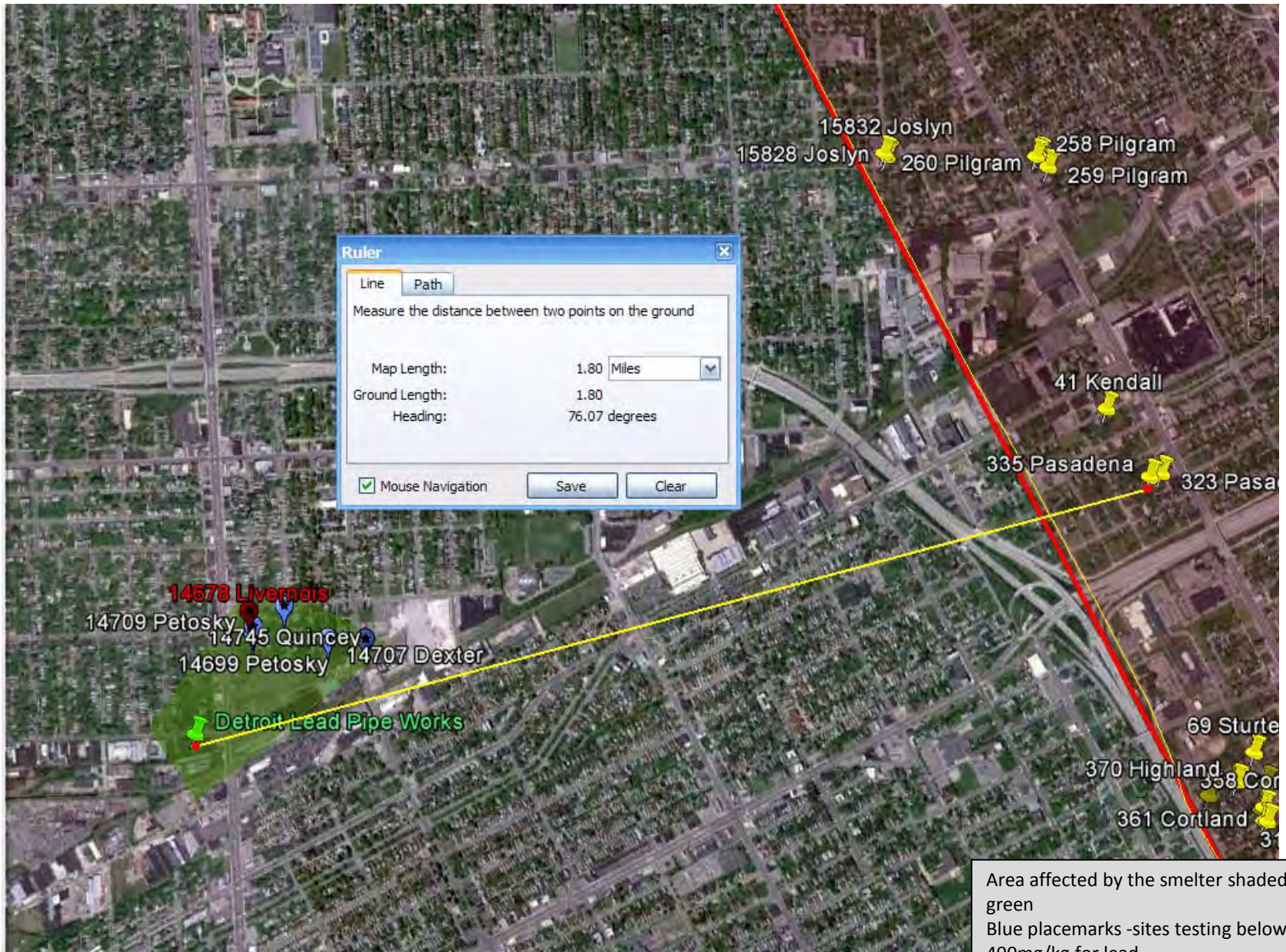


# Appendix J-4: Wind Rose Plot for Detroit Lead Pipe Works





# Appendix J-5: Distance from Target area to Detroit Lead Pipe Works



Area affected by the smelter shaded in green  
Blue placemarks - sites testing below 400mg/kg for lead  
Red placemark - site testing above 400mg/kg for lead

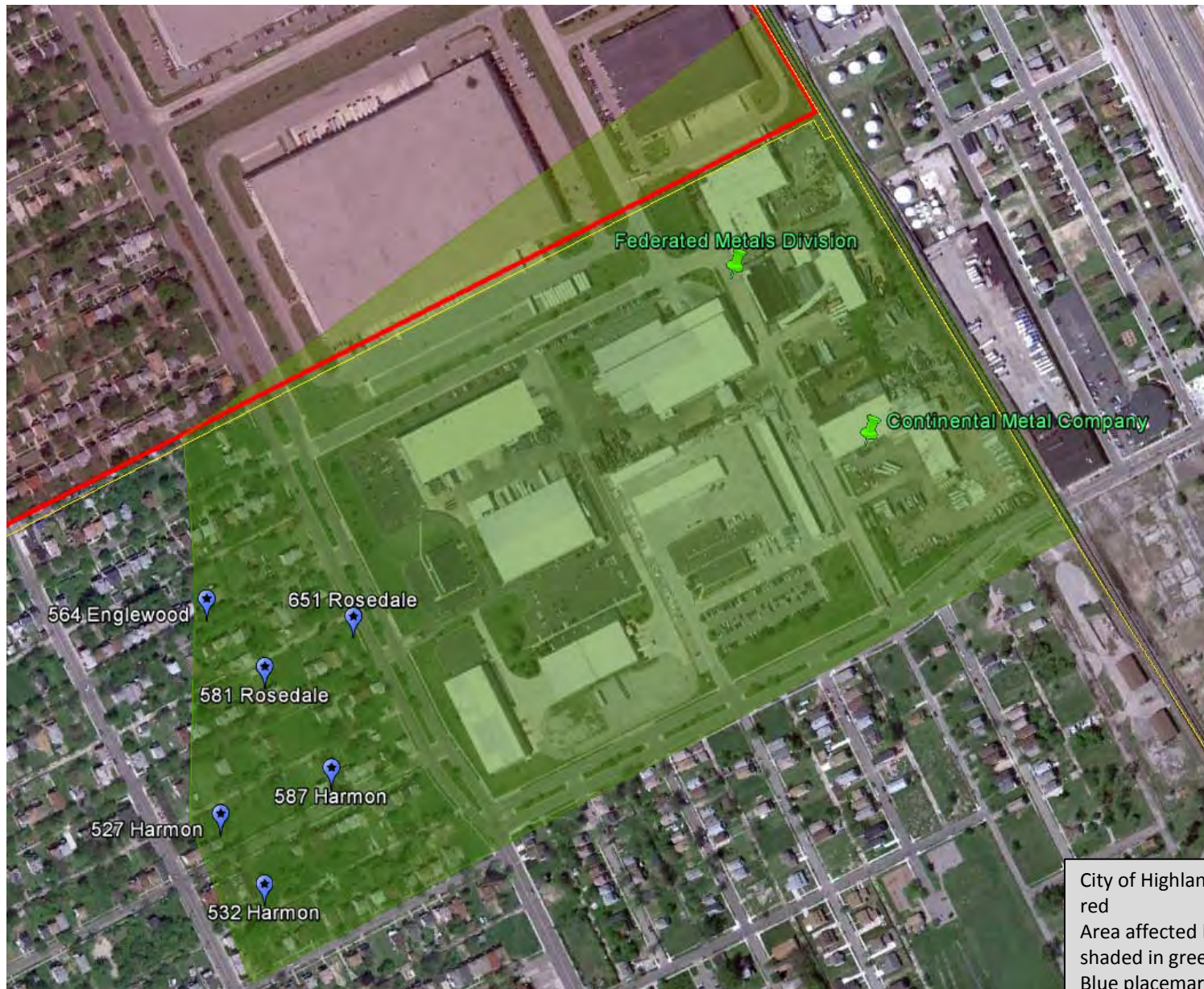


# Appendix J-6: Sites tested downwind from the Detroit Lead Pipe Works





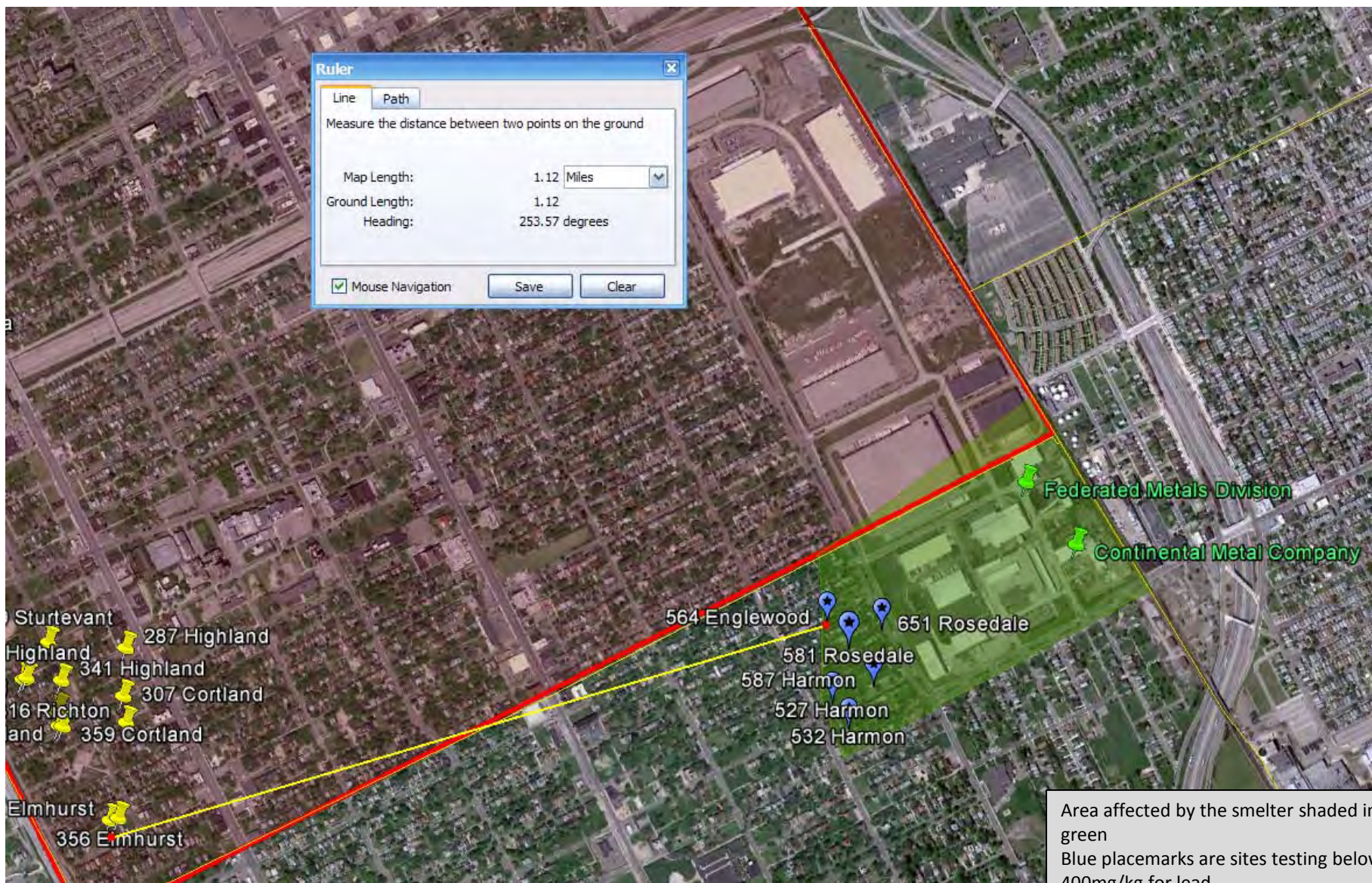
# Appendix J-7: Location of soil samples taken upwind of the Federated Metals Division and Continental Metals Company Lead Smelters



City of Highland Park shaded in red  
Area affected by the smelter shaded in green  
Blue placemarks – soil testing sites



# Appendix J-8: Proximity of sites tested for lead contamination to nearest NSP2 property



Area affected by the smelter shaded in green  
Blue placemarks are sites testing below 400mg/kg for lead  
Yellow pins – NSP2 project sites

## Appendix K: U.S. Census Bureau data for Highland Park



## State &amp; County QuickFacts



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## Highland Park (city), Michigan

Further information

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People QuickFacts	Highland Park	Michigan
Population, 2011 estimate	NA	9,876,187
Population, 2010	11,776	9,883,640
Population, percent change, 2000 to 2010	-29.7%	-0.6%
Population, 2000	16,746	9,938,444
Persons under 5 years, percent, 2010	6.2%	6.0%
Persons under 18 years, percent, 2010	23.7%	23.7%
Persons 65 years and over, percent, 2010	14.4%	13.8%
Female persons, percent, 2010	50.8%	50.9%
-----		
White persons, percent, 2010 (a)	3.2%	78.9%
Black persons, percent, 2010 (a)	93.5%	14.2%
American Indian and Alaska Native persons, percent, 2010 (a)	0.3%	0.6%
Asian persons, percent, 2010 (a)	0.4%	2.4%
Native Hawaiian and Other Pacific Islander, percent, 2010 (a)	Z	0.0%
Persons reporting two or more races, percent, 2010	2.3%	2.3%
Persons of Hispanic or Latino origin, percent, 2010 (b)	1.3%	4.4%
White persons not Hispanic, percent, 2010	2.9%	76.6%
-----		
Living in same house 1 year & over, 2006-2010	83.0%	85.5%
Foreign born persons, percent, 2006-2010	1.0%	5.9%
Language other than English spoken at home, pct age 5+, 2006-2010	2.4%	8.9%
High school graduates, percent of persons age 25+, 2006-2010	74.6%	88.0%
Bachelor's degree or higher, pct of persons age 25+, 2006-2010	8.5%	25.0%
Mean travel time to work (minutes), workers age 16+, 2006-2010	25.0	23.7
Housing units, 2010	6,090	4,532,233
Homeownership rate, 2006-2010	39.6%	74.2%
Housing units in multi-unit structures, percent, 2006-2010	46.4%	18.0%
Median value of owner-occupied housing units, 2006-2010	\$65,000	\$144,200
Households, 2006-2010	5,042	3,843,997
Persons per household, 2006-2010	2.45	2.53

 Per capita money income in past 12 months (2010 dollars) 2006-2010	\$12,304	\$25,135
 Median household income 2006-2010	\$20,205	\$48,432
 Persons below poverty level, percent, 2006-2010	43.7%	14.8%
<b>Business QuickFacts</b>		
	<b>Highland Park</b>	<b>Michigan</b>
 Total number of firms, 2007	1,030	816,972
 Black-owned firms, percent, 2007	70.9%	8.9%
 American Indian- and Alaska Native-owned firms, percent, 2007	F	0.7%
 Asian-owned firms, percent, 2007	2.8%	2.6%
 Native Hawaiian and Other Pacific Islander-owned firms, percent, 2007	F	0.1%
 Hispanic-owned firms, percent, 2007	F	1.3%
 Women-owned firms, percent, 2007	55.3%	30.4%
<hr/>		
 Manufacturers shipments, 2007 (\$1000)	NA	234,455,768
 Merchant wholesaler sales, 2007 (\$1000)	227,986	107,109,349
 Retail sales, 2007 (\$1000)	115,276	109,102,594
 Retail sales per capita, 2007	\$7,872	\$10,855
 Accommodation and food services sales, 2007 (\$1000)	10,581	14,536,648
<b>Geography QuickFacts</b>		
	<b>Highland Park</b>	<b>Michigan</b>
 Land area in square miles, 2010	2.97	56,538.90
 Persons per square mile, 2010	3,963.6	174.8
 FIPS Code	38180	26
Counties	<a href="#">Wayne County</a>	

[Download these tables - delimited](#) | [Download these tables - Excel](#) | [Download the full data set](#)

Population estimates for counties will be available in April, 2012 and for cities in June, 2012.

(a) Includes persons reporting only one race.

(b) Hispanics may be of any race, so also are included in applicable race categories.

D: Suppressed to avoid disclosure of confidential information

F: Fewer than 100 firms

FN: Footnote on this item for this area in place of data

NA: Not available

S: Suppressed; does not meet publication standards

X: Not applicable

Z: Value greater than zero but less than half unit of measure shown

[What do you think of QuickFacts?](#)

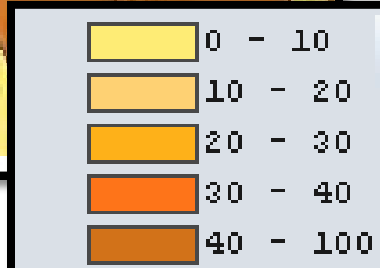
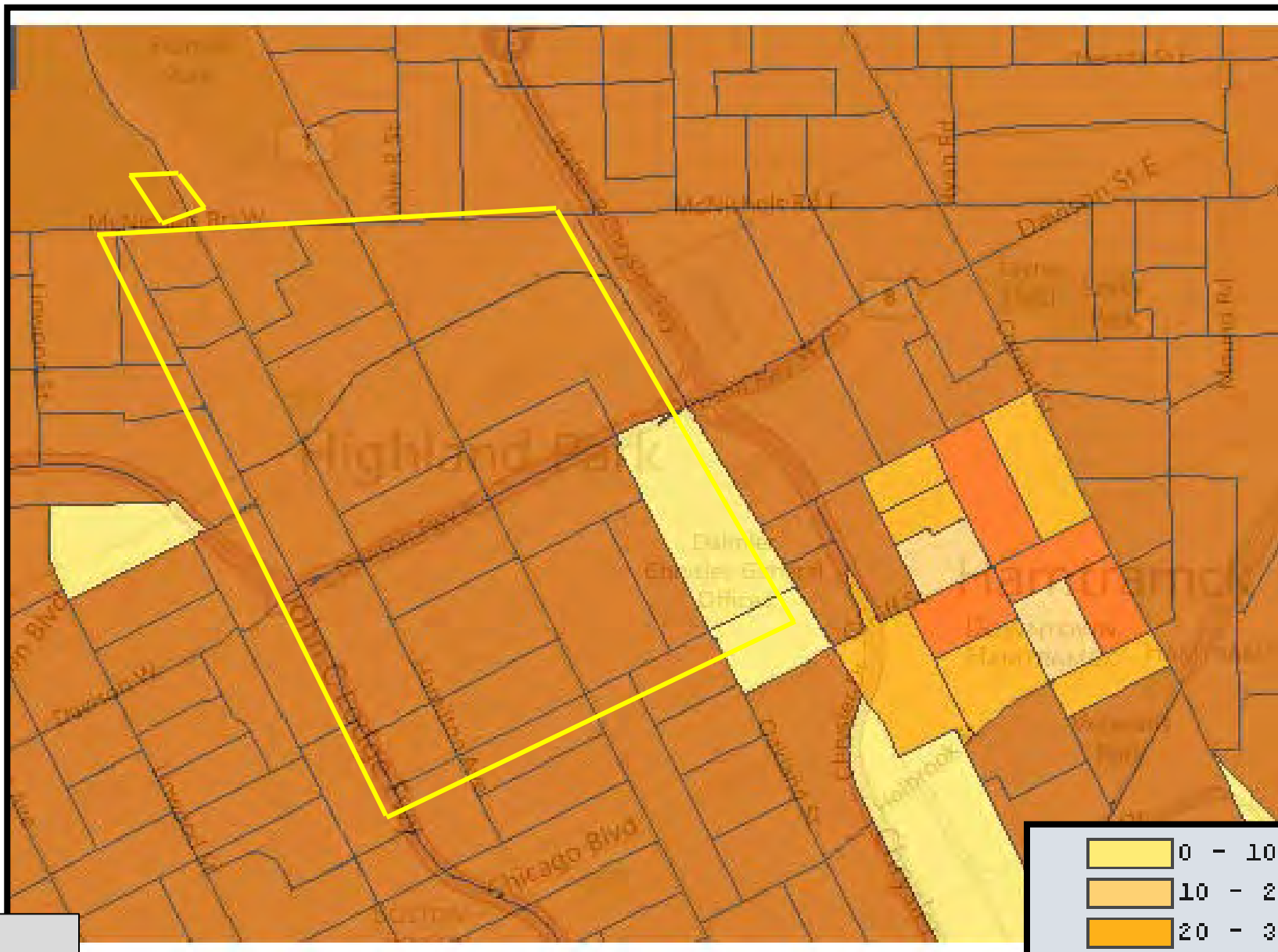
Source U.S. Census Bureau: State and County QuickFacts. Data derived from Population Estimates, American Community Survey, Census of Population and Housing, County Business Patterns, Economic Census, Survey of Business Owners, Building Permits, Consolidated Federal Funds Report, Census of Governments

Last Revised: Tuesday, 31-Jan-2012 17:16:42 EST

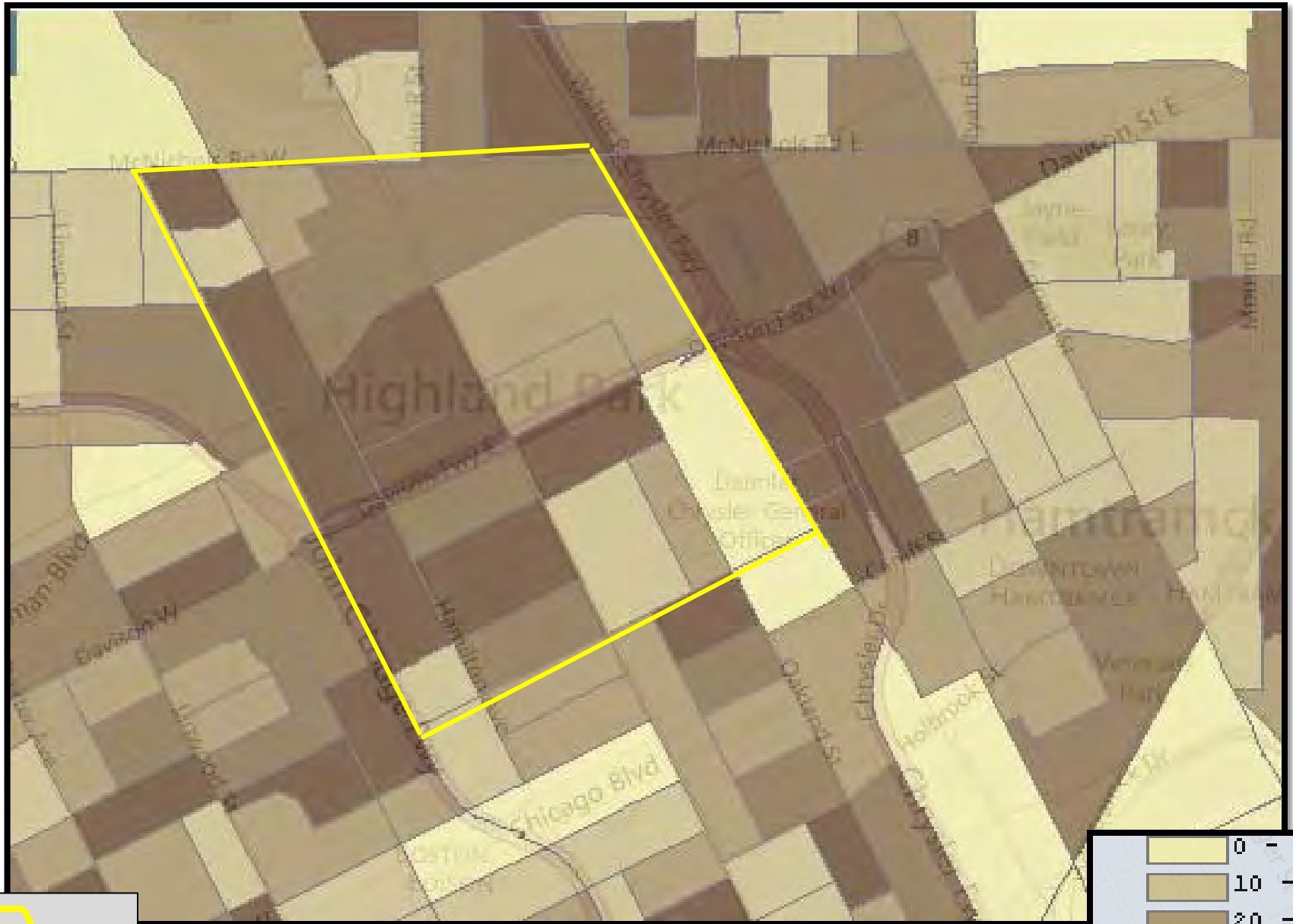
[Privacy Policy](#) | [2010 Census](#) | [Data Tools](#) | [Information Quality](#) | [Product Catalog](#) | [Contact Us](#) | [Home](#)

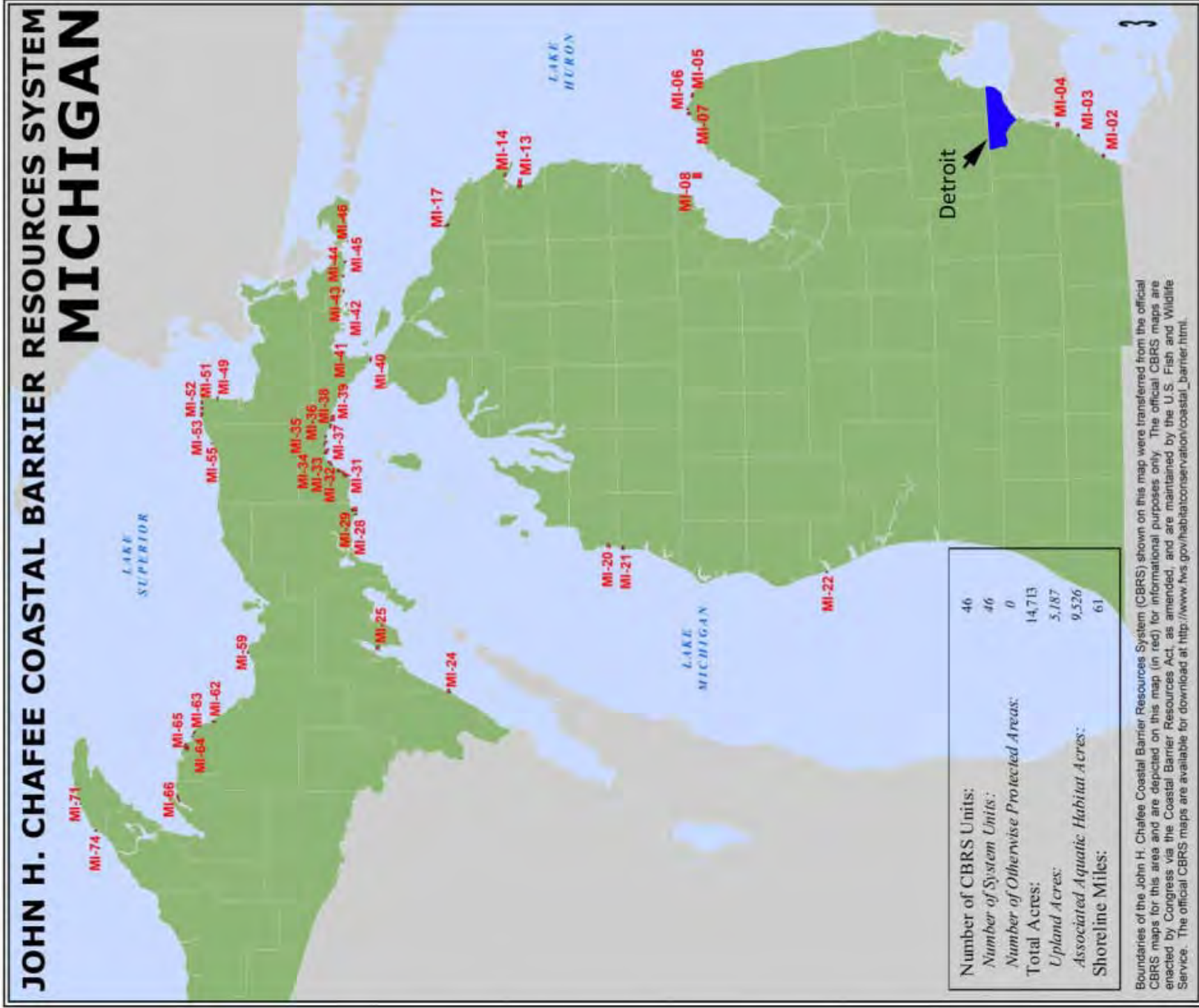


# Appendix L-1: Percent below minority



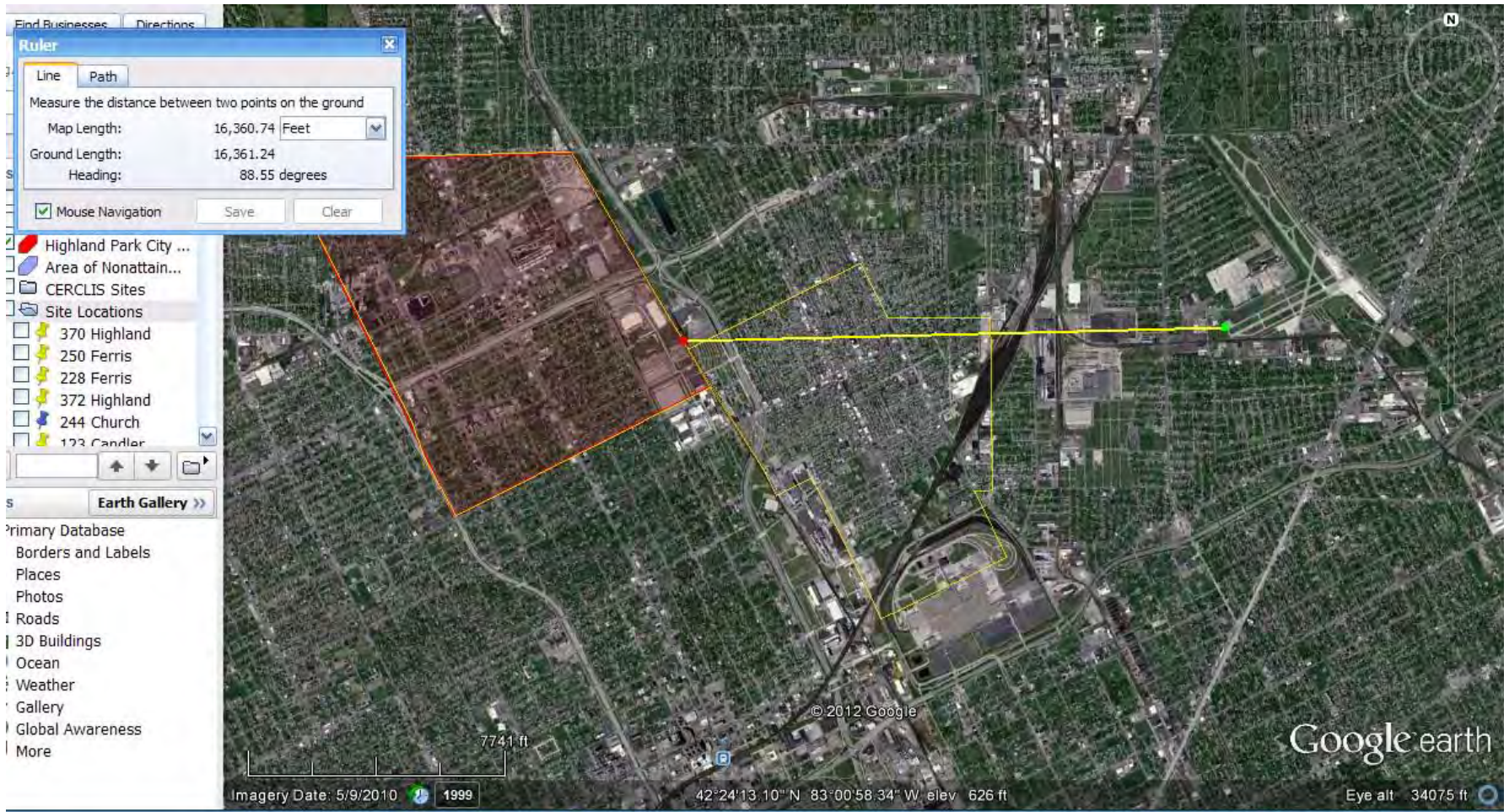
# Appendix L-2: Percent below poverty line







# Appendix N: Distance between NSP2 Target Area and the airport



6/5/2012

## Highland Park Section 106 Consultation Recommendations for Proposed NSP2 Funding Related to Demolitions of Eleven Duplexes

To assist the City of Highland Park in its due diligence for compliance with Section 106 of the National Historic Preservation Act and applicable guidelines at 36 CFR Part 800, a 36 CFR 61 qualified architectural historian undertook a desktop review of the eleven multi-family residences slated for demolition under the Neighborhood Stabilization Program 2 (NSP2). The desktop review included an assessment of each property based on photo documentation and images from Google Earth Pro (copyright). The property was assessed for potential National Register of Historic Places (NRHP) eligibility under Criterion C. While the review is not exhaustive, the images were sufficient to determine a general assessment of integrity and whether the property contained the high artistic value and architectural distinction necessary to warrant further identification efforts or be considered NRHP eligible under Criterion C.

All eleven properties were determined to be not eligible for inclusion in the NRHP under Criterion C. A majority of these properties have been subject to alterations and integrity loss, and would generally be considered standard, vernacular early 20<sup>th</sup> century buildings. Furthermore, Google Earth Pro images of the surrounding environs showed that it is very unlikely any of these properties are within neighborhoods that would warrant further consideration as potential NRHP historic districts.

It is recommended that Section 106 review documentation be sent by the City of Highland Park to the Michigan State Historic Preservation Officer (SHPO) that includes the following: a reference to NSP2, the federal program funding the proposed demolitions, a project description, a map locating the proposed demolitions, and the enclosed photos, building descriptions, and eligibility assessments. As none of the buildings appear to be NRHP eligible or warrant further identification efforts, a Section 106 finding of *no historic properties affected* should be proposed for the NSP2 undertaking. The eleven buildings are located at the following addresses:

- **104/106 Church Street**
- **358/360 Cortland Street**
- **359/361 Cortland Street**
- **356 Elmhurst Street**
- **92 Kendall Street**
- **258/260 Pilgrim Street**
- **257/259 Pilgrim Street**
- **316 Richton Street**
- **132 Stevens Street**
- **135 Stevens Street**
- **139 Stevens Street**

For each of the eleven properties, photographs, a description, an analysis of integrity and a discussion of its potential for NRHP eligibility is presented on the following pages.



## 104/106 Church Street



104/106 Cortland Street: Northwest Elevation



104/106 Cortland Street: View Southwest

### Description

This building is a circa 1915 two-story four-square duplex. The building has a hipped roof clad in composite asphalt shingles. The exterior is clad in an asbestos or asphalt siding. The primary (northwestern) elevation is two bays wide with a hip roof entry porch supported by metal piers. Concrete steps lead to two separate primary entry doors. There are bay windows on the primary and secondary (southwestern) elevations. Windows throughout the house are 1/1 double hung wood sash windows and a hipped dormer with wood shingles extends from roof on the primary elevation.

### Integrity

This building retains its integrity of location, design, and feeling, but has lost integrity of materials, workmanship, setting, and association. Alterations to the building, including incompatible exterior cladding, replaced porch supports, and the addition of a primary entry door coupled with general

deferred maintenance compromises the building's integrity of materials and workmanship. The neighborhood surrounding 104/106 Church Street consists primarily of newly constructed homes and this property appears to be one of only two historic-age homes on the block, so there is no potential for contributing to a historic district. The new construction in the vicinity of 104/106 Church Street has drastically altered the setting of the block.

### Potential for NRHP Eligibility

Based on a windshield review of this building by a 36 CFR 61 qualified architectural historian, 104/106 Church Street does not appear to be eligible for the NRHP under Criterion C. Alterations to the property and a subsequent loss of integrity of materials, workmanship, setting, and association, coupled with a general lack of architectural distinction render this property ineligible under Criterion C. Assuming there are no extenuating circumstances that would render this property eligible under Criteria A or B, NSP2 proposed work on 104/106 Church Street would have *no effect on historic properties*.

## 358/360 Cortland Street



358/360 Cortland: Southeast Elevation

### Description

This building is a circa 1915 two-story four-square duplex with Craftsman style details. The brick building has a hipped roof clad in composite asphalt shingles. The primary elevation faces southeast and is two bays wide with an entry porch supported by brick piers that extend beyond the flat porch roof. Wood stairs lead to the two primary entry doors currently covered by metal security doors. A metal awning and a wood railing have been added to create a second story balcony. There is a second story door leading to the balcony. Remaining windows appear to be wood sash windows and the primary elevation has two bands of 1/1 double hung windows, although the first story windows are currently covered with plywood. There is a hipped roof dormer window with exposed eaves and a band of small wood sash casement windows.

### Integrity

Alterations to the building, including the façade changes from the converted balcony, the loss of original windows, and the addition of metal security doors and addition of a second story doorway, compromise the building's integrity of design, materials, and workmanship. 358/360 Courtland Street is in a neighborhood of early 20<sup>th</sup> century Craftsman style homes and the building maintains its integrity of location, setting, feeling, and association.

### Potential for NRHP Eligibility

Based on a windshield review of this building by a 36 CFR 61 qualified architectural historian, 358/360 Courtland Street does not appear to be eligible for the NRHP under Criterion C. Alterations to the property and a subsequent loss of integrity of materials and workmanship, coupled with a general lack of architectural distinction render this property ineligible under Criterion C. Furthermore, while the property is in a neighborhood of early 20<sup>th</sup> century homes, most of the neighborhood housing stock has undergone similar modifications and integrity loss. The neighborhood has some historic association, however, does not have the overall architectural distinction or high integrity needed to be considered an NRHP historic district. Assuming there are no extenuating circumstances that would render this property eligible under Criteria A or B, NSP2 proposed work on 358/360 Cortland Street would have *no effect on historic properties*.

### 359/361 Cortland Street



359/361 Cortland Street: Northwest Elevation





359/361 Cortland Street: view Southeast

### Description

This building is a circa 1920 two-story four-square duplex. The building has a hipped roof clad in composite asphalt shingles. The building sits on a concrete foundation and the primary elevation faces northwest. The building is clad in vinyl siding and windows throughout the building have been replaced with vinyl frame windows. The fenestration pattern has been altered and new door openings on the first and second floor have been added. The primary elevation is two bays wide with a full-width, flat roof porch supported by metal piers. A metal railing has been added to the porch roof to create a second story balcony. Few design details remain save a hipped roof dormer window with a band of small, wood sash windows.

### Integrity

This building has undergone extensive alterations and has poor integrity. Loss of historic materials, changes to fenestration patterns, and façade alterations compromise the building's integrity of design, workmanship, materials, and feeling. 359/361 Courtland Street is in a neighborhood of early 20<sup>th</sup> century Craftsman style homes and the building maintains its integrity location, setting, and association.

### Potential for NRHP Eligibility

Based on a windshield review of this building by a 36 CFR 61 qualified architectural historian, 359/361 Courtland Street is not eligible for the NRHP under Criterion C. The property has maintained integrity loss to the point that it does not convey its historic significance, therefore, cannot be evaluated under NRHP Criteria. NSP2 proposed work on 359/361 Cortland Street would have *no effect on historic properties*.

## 356 Elmhurst Street



356 Elmhurst Street: Southwest Elevation



356 Elmhurst Street: view southeast

### Description

This building is a circa 1915 two-story, four-square duplex. The brick building has a hipped roof clad in composite asphalt shingles with wood shingle clad dormer windows extending from the southeast and southwest elevations. The primary façade faces southeast and has a partial-width porch supported by metal piers. Extant windows are wood sash multi-pane and 1/1 double hung sash windows. Numerous window sashes have been removed. The porch appears to have been altered and there is a large,



boarded opening surrounding a non-original doorway. One original multi-lite wood doorway remains on the second-story.

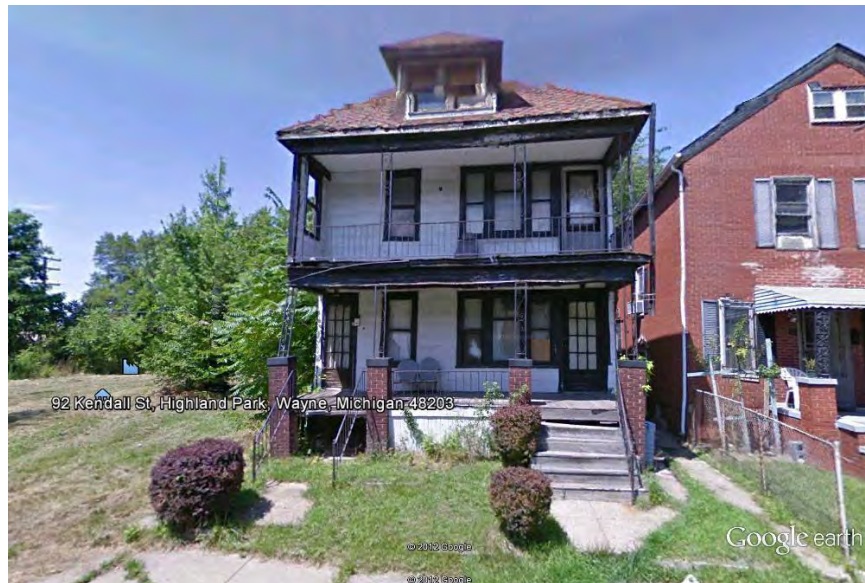
### Integrity

This building has undergone extensive alterations and has poor integrity. Loss of historic materials and façade alterations compromise the building's integrity of design, workmanship, materials, and feeling. 356 Elmhurst Street is in a neighborhood of early 20<sup>th</sup> century Craftsman style homes and the building maintains its integrity location, setting, and association.

### Potential for NRHP Eligibility

Based on a windshield review of this building by a 36 CFR 61 qualified architectural historian, 356 Courtland Street is not eligible for the NRHP under Criterion C. The property has extensive integrity loss and is not a distinctive example of its type, period, or method of construction. Furthermore, while the property is in a neighborhood of early 20<sup>th</sup> century homes, most of the neighborhood housing stock has undergone similar modifications and integrity loss. The neighborhood has some historic association, however, does not have the overall architectural distinction or high integrity needed to be considered a National Register historic district. NSP2 proposed work on 359/361 Cortland Street would have *no effect on historic properties*.

## 92 Kendall Street



92 Kendall Street: Southeast Elevation



92 Kendall Street: view northeast

### Description

This building is a circa 1915 two-story four-square Craftsman style duplex. The building has a hipped roof clad in composite asphalt shingles and the exterior is clad in asbestos shingles. Windows throughout the house are primarily wood 1/1 double hung sash windows. The primary elevation faces southeast and has a full-width two story porch supported by brick piers with metal supports. Wood stairs lead to two primary entrance doors, both original wooden doors glazed with twelve lights. Craftsman style architectural details include a hipped roof dormer window, bands of windows, and the multi-lite doors. The second-story balcony/porch has been partially enclosed on the southwest elevation. This building is currently vacant and has suffered loss of materials through deferred maintenance.

### Integrity

This building has undergone extensive alterations and maintains only fair integrity. Loss of historic materials and façade alterations compromise the building's integrity of workmanship, materials, and feeling. There are some historic-age homes immediately neighboring 164 Elmhurst Street, however, the block has been subject to multiple demolitions and most parcels are vacant. The neighborhood is no longer cohesive and compromises the building's integrity of association and setting.

### Potential for NRHP Eligibility

Based on a windshield review of this building by a 36 CFR 61 qualified architectural historian, 92 Kendall Street is not eligible for the NRHP under Criterion C. Alterations such as non-original exterior cladding, replaced porch supports, and loss of materials due to deferred maintenance coupled with a general lack of architectural distinction render this property ineligible for the NRHP under Criterion C. Furthermore, while the property is in a neighborhood of early 20<sup>th</sup> century homes, most of the neighborhood housing stock has undergone similar modifications and integrity loss. The neighborhood has some historic association, however, does not have the overall architectural distinction or high integrity needed to be considered an NRHP historic district. Assuming there are no extenuating circumstances that would render this property eligible under Criteria A or B, NSP2 proposed work on 92 Kendall Street would have *no effect on historic properties*.

## 258/260 Pilgrim Street



258/260 Pilgrim Street: Southeast elevation



258/260 Pilgrim Street: view northwest

### Description

This building is a circa 1915 two-story four-square duplex. The building has a hipped roof clad in composite asphalt shingles with a hipped dormer extending from the southeastern elevation. The brick building faces southeast and the primary elevation is two bays wide with a full-width porch supported by brick piers. Windows throughout the house are wood double hung sash windows, although some windows have been completely removed and there are replacement windows on the primary and secondary elevations. Craftsman style architectural details include 3/1 wood sash windows, exposed eaves, and a wood multi-light door. This building is currently vacant and has suffered loss of materials through deferred maintenance.



### Integrity

The building retains integrity of design, location, and feeling. General deterioration and loss of some historic materials compromise integrity of materials and workmanship. 258/260 Pilgrim Street is in a neighborhood of homes of similar style, type, and scale, however, the area has been subject to demolitions and many homes have undergone alterations that compromise integrity of setting and association.

### Potential for NRHP Eligibility

Based on a windshield review of this building by a 36 CFR 61 qualified architectural historian, 258/260 Pilgrim Street is not eligible for the NRHP under Criterion C. Alterations such as replaced windows and loss of materials due to deferred maintenance coupled with a general lack of architectural distinction render this property ineligible for the NRHP under Criterion C. Furthermore, while the property is in a neighborhood of early 20<sup>th</sup> century homes, most of the neighborhood housing stock has undergone similar modifications and integrity loss. The neighborhood has some historic association, however, does not have the overall architectural distinction or high integrity needed to be considered an NRHP historic district. Assuming there are no extenuating circumstances that would render this property eligible under Criteria A or B, NSP2 proposed work on 258/260 Pilgrim Street would have *no effect on historic properties*.

### 257/259 Pilgrim Street



257/259 Pilgrim Street: Northwest Elevation



257/259 Pilgrim Street: View northeast

### Description

This building is a 1916 two-story four-square brick duplex. The building has a hipped roof clad in composite asphalt shingles with a hipped dormer extending from the northwest elevation. The primary elevation faces northwest and is two bays wide with a full-width two-story porch supported by wooden piers resting on brick supports. Windows throughout the house are 1/1 wood double hung sash windows. Most windows remain intact, although all three sashes have been removed from the dormer window. There are two primary entry doors on the first floor and a door to the second-story porch. There have been some façade alterations, including the addition of wood lattice work around the first story porch and shutters surrounding the first-story windows.

### Integrity

This property maintains integrity of materials, workmanship, design, location, feeling, and association. Façade alterations are largely removable and loss of historic materials is limited to the wood sash dormer windows. The surrounding neighborhood consists primarily early 20<sup>th</sup> century two-story homes of similar style, size, and scale, however many homes suffer moderate to severe integrity loss and there have been multiple demolitions in the area. These changes compromise the historic setting and association of the neighborhood.

### Potential for NRHP Eligibility

Based on a windshield review of this building by a 36 CFR 61 qualified architectural historian, 257/259 Pilgrim Street is not eligible for the NRHP under Criterion C. The building maintains integrity, however, does not possess high artistic value nor is it a distinctive example of a Prairie style building. Furthermore, while the property is in a neighborhood of early 20<sup>th</sup> century homes, most of the neighborhood housing stock has undergone modifications and integrity loss. The neighborhood has some historic association, however, does not have the overall architectural distinction or high integrity needed to be considered an NRHP historic district. Assuming there are no extenuating circumstances that would render this property eligible under Criteria A or B, NSP2 proposed work on 257/259 Pilgrim Street would have *no effect on historic properties*.



## 316 Richton Street



316 Richton Street: Southeast Elevation

### Description

This building is a circa 1920 two-story four-square duplex. The building has a hipped roof clad in composite asphalt shingles with a hipped dormer window extending from the southeastern elevation. The primary elevation faces southeast and is three bays wide with a full-width porch supported by brick piers. A metal railing has been added to the porch roof to create a second story balcony and a second-story doorway was added. The building is clad in vinyl siding. Windows throughout the building are 1/1 double hung sash windows, although at least one window sash has been removed. Concrete steps lead to the two main entry doors, both of which appear to have been replaced. This building is vacant and is suffering material loss from deferred maintenance.

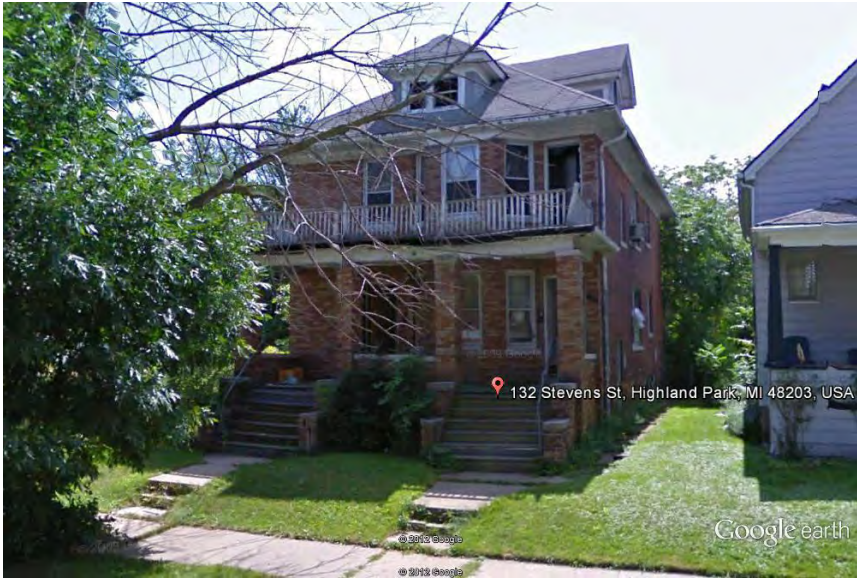
### Integrity

Loss of historic materials, non-original exterior cladding, and façade alterations compromise this building's integrity of workmanship, materials, and feeling. 316 Richton Street is in a neighborhood of early 20<sup>th</sup> century homes and the building maintains its integrity location, design, setting, and association. The neighborhood housing stock is cohesive in terms of age, style, and scale, however, many homes suffer from integrity loss and the immediate area has been subject to multiple demolitions.

### Potential for NRHP Eligibility

Based on a windshield review of this building by a 36 CFR 61 qualified architectural historian, 316 Richton Street is not eligible for the NRHP under Criterion C. The property has maintained significant integrity loss, does not hold high artistic value, and is not a distinctive example of its type, period, or method of construction. Furthermore, while the property is in a neighborhood of early 20<sup>th</sup> century homes, most of the neighborhood housing stock has undergone similar modifications and integrity loss. The neighborhood has some historic association, however, does not have the overall architectural distinction or high integrity needed to be considered an NRHP historic district. Assuming there are no extenuating circumstances that would render this property eligible under Criteria A or B, NSP2 proposed work on 316 Richton Street would have *no effect on historic properties*.

# 132 Stevens Street



132 Stevens Street: Northwest Elevation



132 Stevens Street: view northeast

## Description

This building is a circa 1920 two-story four-square duplex. The building has a hipped roof clad in composite asphalt shingles with a hipped dormer extending from the northwestern and a gabled dormer extending from the southwestern elevation. The brick building faces northwest and the primary elevation is two bays wide with a full-width porch supported by brick piers. A wooden railing extends along the porch roof, creating a second-story balcony. Windows throughout the house are 1/1 wood double hung sash windows, although some windows sashes have been removed. Brick on the primary elevation is of a different color and bond than the secondary elevations. There is a two-story wood porch on the rear elevation.

### Integrity

132 Stevens Street retains integrity of design, location, materials, workmanship and feeling. Integrity loss is limited to material deterioration due to deferred maintenance. 132 Stevens Street is in an older neighborhood, however, the area has undergone changes due to demolitions and new construction that compromise integrity of setting and association.

### Potential for NRHP Eligibility

Based on a windshield review of this building by a 36 CFR 61 qualified architectural historian, 132 Stevens Street is not eligible for the NRHP under Criterion C. The building does not possess high artistic value, nor is a distinctive example of its type, period, or method of construction. Furthermore, while the property is in a neighborhood of early 20<sup>th</sup> century homes, most of the neighborhood housing stock has undergone modifications and integrity loss. The neighborhood has some historic association, however, does not have the overall architectural distinction or high integrity needed to be considered an NRHP historic district. Assuming there are no extenuating circumstances that would render this property eligible under Criteria A or B, NSP2 proposed work on 259 Pilgrim Street would have *no effect on historic properties*.

## 135 Stevens Street



135 Stevens Street: Southeast Elevation





135 Stevens Street: View northeast

### Description

This building is a circa 1915 two-story apartment building. The brick building has a flat roof with a brick parapet. The primary elevation faces southeast and is three bays wide. There is a gable roof portico over the central entryway flanked by first and second story wood balconies on either side. Windows on the primary elevation are 1/1 wood sash windows with decorative leaded glass and windows on the secondary elevation are single pane 1/1 wood sash windows. Doors to each of the four dwelling units leading to the exterior balconies are multi-lite wood doorways. Decorative features include Craftsman style wood windows and doors, decorative brickwork on the primary elevation, and exposed eaves on the shed roof of the second-story balconies. There is wood lattice work along each balcony that does not appear original to the building.

### Integrity

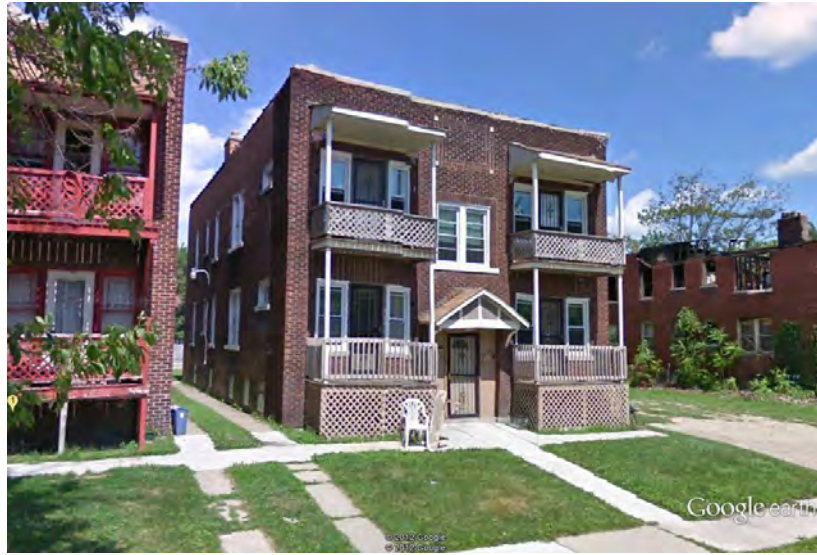
135 Stevens Street retains integrity of location, design, materials, workmanship, and feeling. There are few notable alterations and the building maintains many of its original design features. The property is in an older neighborhood, however, the area has undergone changes due to demolitions and new construction that compromise its integrity of setting and association.

### Potential for NRHP Eligibility

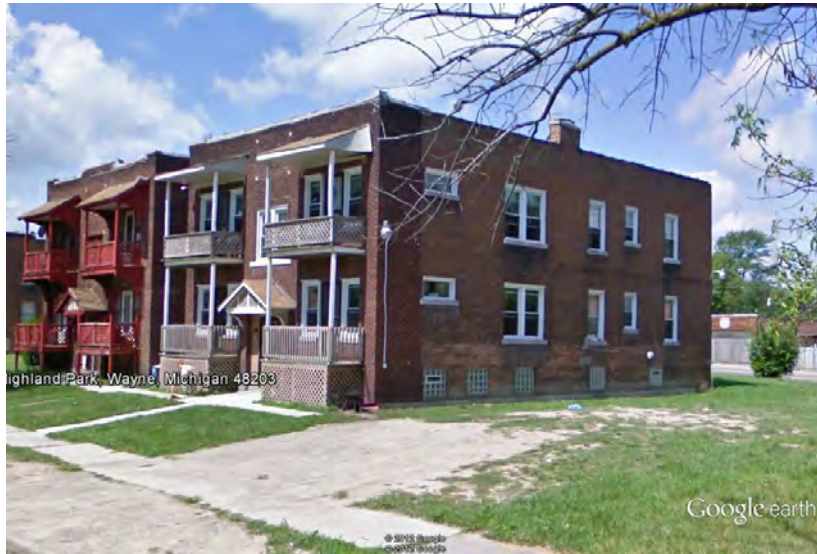
Based on a windshield review of this building by a 36 CFR 61 qualified architectural historian, 135 Stevens Street is not eligible for the NRHP under Criterion C. The building maintains integrity, however, does not possess high artistic value nor is it a distinctive example of its type, period, or method of construction. Furthermore, while the property is in a neighborhood of early 20<sup>th</sup> century homes, most of the neighborhood housing stock has undergone modifications and integrity loss. The neighborhood has some historic association, however, does not have the overall architectural distinction or high integrity needed to be considered an NRHP historic district. Assuming there are no extenuating circumstances that would render this property eligible under Criteria A or B, NSP2 proposed work on 135 Stevens Street would have *no effect on historic properties*.



## 139 Stevens Street



139 Stevens Street: Southeast Elevation



139 Stevens Street: View northwest

### Description

This building is a circa 1915 two-story apartment building. The brick building has a flat roof and appears to have four dwelling units. The primary elevation faces southeast and is three bays wide. There is a gable roof portico over the central entryway flanked by first and second story wood balconies on either side. This building appears to have undergone some renovations and windows on the primary and secondary elevations have been replaced with 1/1 white vinyl sash windows. Other alterations include replacement doors, new railings and lattice work on the four balconies, and enclosed eaves on the second story balcony shed roofs.

### **Integrity**

139 Stevens Street retains integrity of location and association, but has undergone alterations that compromise the building's integrity of materials, design, and workmanship. 139 Stevens Street is in an older neighborhood, however, the area has undergone changes due to demolitions and new construction that compromise integrity of setting.

### **Potential for NRHP Eligibility**

Based on a windshield review of this building by a 36 CFR 61 qualified architectural historian, 139 Stevens Street is not eligible for the NRHP under Criterion C. The building has compromised integrity due to a loss of historic materials and design features and lacks architectural distinction. Furthermore, while the property is in a neighborhood of early 20<sup>th</sup> century homes, most of the neighborhood housing stock has undergone modifications and integrity loss. The neighborhood has some historic association, however, does not have the overall architectural distinction or high integrity needed to be considered an NRHP historic district. Assuming there are no extenuating circumstances that would render this property eligible under Criteria A or B, NSP2 proposed work on 139 Stevens Street would have *no effect on historic properties*.

# PRIMARY RECORD

Other Listings

Review Code \_\_\_\_\_ Reviewer \_\_\_\_\_ Date \_\_\_\_\_

Page 1 of 6

Resource Name or #: Oxford Street Apartments/Verona Terrace Apartments/La Bertha

**P1. Other Identifier:**

**P2. Location:**  Not for Publication  Unrestricted

and (P2b and P2C or P2d. Attach a Location Map as necessary.)

**a. County** Los Angeles

**b. USGS 7.5' Quad** Date T ; R ; 1/4 of 1/4 of Sec ; **B.M.**

**c. Address** 960 S OXFORD AVE

City Los Angeles

Zip

**d. UTM: Zone ; mE/ mN**

**e. Other Locational Data:**

**P3a. Description:**

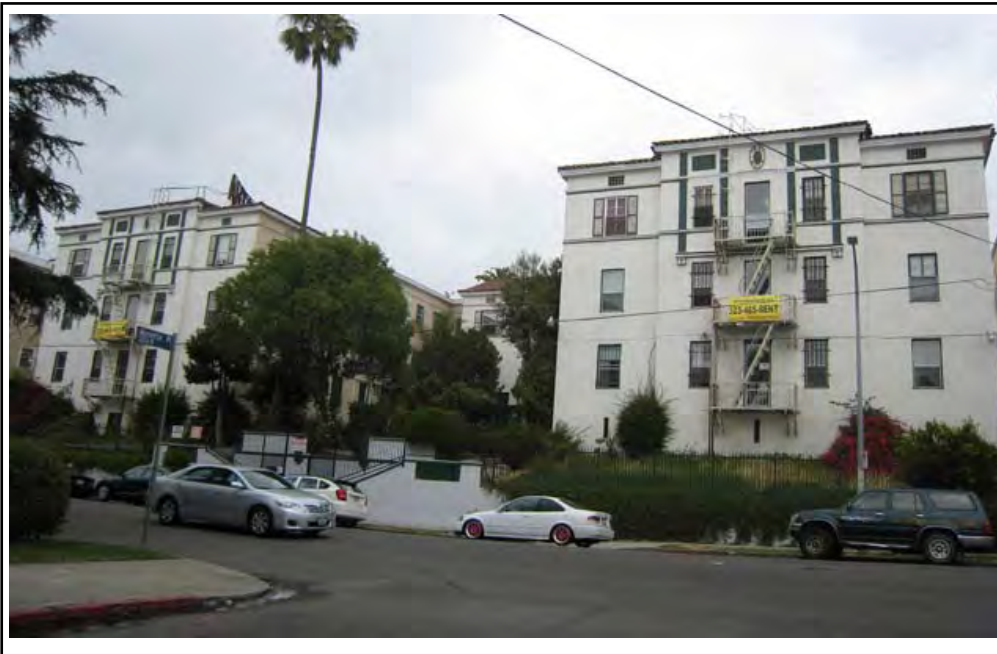
The property located at 954-968 S. Oxford Avenue is a four-story multiple-family apartment building with a U-shaped plan and platform frame wood construction. Built on an elevated city lot, the building has a west-east orientation, fronting S. Oxford Avenue on the west. It is accessed by two adjacent staircases that lead from the public right-of-way to an interior courtyard, created by the U-shaped plan. The building was originally designed in the Spanish Colonial Revival style.

The building has a flat roof, which is highlighted by a low-pitch clay tile clad parapet that accents the primary elevations. The exterior walls are clad with a coarse troweled stucco finish. The primary (west) elevation is symmetrically divided, consisting of three principle sections, corresponding with the U-shaped plan. Two projecting wings flank a central recessed section, which forms the aforementioned interior courtyard. The courtyard provides access to the building's primary front entrance and is landscaped with mature trees and bushes. Original scored concrete walkways surround an inner garden and lead to an expansive terrace accessed by curved concrete steps. The terrace entrance is flanked on either side by a pair of capped pedestals connected by metal pipe railings.

(See Continuation Sheet)

**P3b. Resources Attributes:** 03 Multiple Family Property

**P4. Resources Present:**  Building  Structure  Object  Site  District  Element of District  Other



**P5b. Description of Photo:**

West Elevation, Looking Northeast

**P6. Date Constructed/Age and Sources:**  Historic  Both  
 Prehistoric

1923 (F) Building Permit

**P7. Owner and Address:**

Oxford Artiste Ltd  
1813 N Cahuenga BLVD  
Hollywood, CA 90028

**P8. Recorded by:**

M. Potter, J. Blemker-Ferree & C. Hetzel  
ICF International  
811 W 7th ST, Suite 800  
Los Angeles, CA 90017

**P9. Date Recorded:** 5/19/2011

**P10. Survey Type:**

City of Los Angeles Section 106  
Review.

**P11. Report Citation:** None.

**Attachments:**  NONE  Location Map  Sketch Map  Continuation Sheet  Building, Structure, and Object Record  
 Archaeological Record  District Record  Linear Feature Record  Milling Station Record  Rock Art Record  
 Artifact Record  Photograph Record  Other:

# BUILDING, STRUCTURE, AND OBJECT RECORD

Page 2 of 6

NRHP Status Code 2S2

Resource Name or #: Oxford Street Apartments/Verona Terrace Apartments/La Bertha

- B1. **Historic Name:** Oxford Street Apartments
- B2. **Common Name:** Verona Terrace Apartments, La Bertha
- B3. **Original Use:** Multiple-Family Apartments
- B4. **Present Use:** Multiple-Family Apartments
- B5. **Architectural Style:** Italian Renaissance Revival
- B6. **Construction History:**

- B7. **Moved?**  No  Yes  Unknown      **Date:** **Original Location:**
- B8. **Related Features:**

- B9a. **Architect:** Gable and Wyant      **b. Builder:** Unknown
- B10. **Significance:** **Theme** Residential Architecture      **Area** Wilshire Center District of Los Angeles
- Period of Significance** 1923 **Property Type** Multiple-Family Apartment **Applicable Criteria** A and C

The apartment building at 960 S. Oxford Avenue, originally named the "Oxford Street Apartments" and now known as the "La Bertha," is eligible for listing in the National Register of Historic Places under Criteria A and C at the local level of significance as an excellent example of a large multiple-family apartment building constructed in the Wilshire Center area of Los Angeles in the 1920s, and for its association with the architectural firm of Gable and Wyant. The property was previously recommended as eligible for listing in the National Register of Historic Places (NRHP) in a survey completed by the Community Redevelopment Agency of Los Angeles in June 2009. Designed in the Italian Renaissance Revival style, the building has good integrity and its character-defining features are essentially unaltered.

The La Bertha's construction occurred as part of the development of Wilshire Boulevard west of downtown Los Angeles, during the economic boom the city experienced in the 1920s. During this period, the three mile section of Wilshire Boulevard in the vicinity of the La Bertha, known as the "Wilshire Center," grew into an exclusive residential district and became the

(See Continuation Sheet)

- B11. **Additional Resource Attributes:** 03 Multiple Family Property

- B12. **References:**

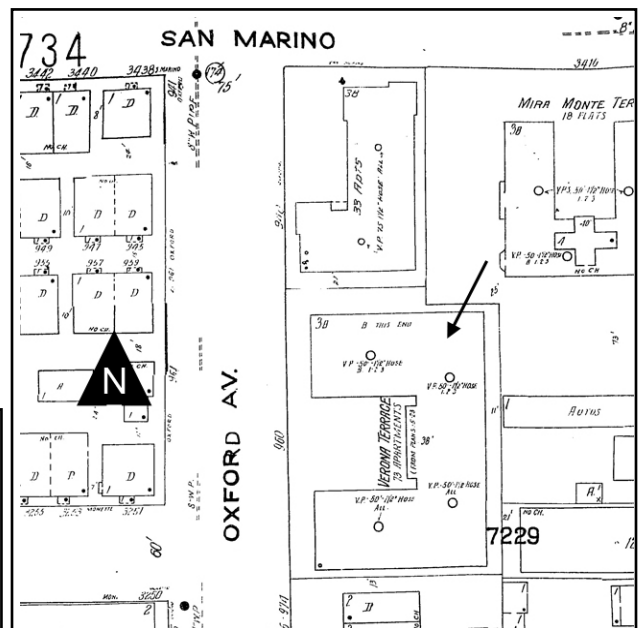
(See Continuation Sheet)

- B13. **Remarks:**

- B14. **Evaluator:** Meghan Potter and Christopher Hetzel, ICF International, 811 W 7th ST, Suite 800, Los Angeles, CA 90017

**Date of Evaluation:** 5/19/2011

(This space reserved for official comments.)





## CONTINUATION SHEET

Page 3 of 6

Resource Name or #: Oxford Street Apartments/Verona Terrace Apartments/La Bertha

Recorded by: ICF International

Date: 5/19/2011

Continuation  Update

### P3a. Description, Continued:

The west elevation at the courtyard is symmetrically divided into three prominent bays. The building's primary entrance is located in the center bay and features a decorative cast concrete door surround. The surround is capped by a broken scroll pediment, which is situated atop a frieze containing pateras and garland. The door opening contains a multiple-light door with a turned spindle wood frame and features a rectangular transom and sidelights. On the first story, the adjacent bays each contain French doors with transoms, framed by cast concrete door surrounds, and capped by an understated entablature. Wood awning brackets flank each French door entryway. On the second story, each bay is punctuated by window openings—one in the outer bays and two in the center. The window openings contain consist of one-over-one double hung windows. The third story is defined by two belt courses. The outer bays contain original four-over-four wood sash windows flanked by wood shutters. The central bay is visually accented by a row of four small one-over-one wood frame windows separated by pilasters, and footed by an ornamental course of dentil molding. A central cartouche is highlighted by two evenly spaced flat shields on either side. Modest scroll brackets cap each of the pilasters in the center bay, while the outer window bays contain decorative vents.

The projecting wings mirror each other and are divided into three symmetrical sections consisting of five window bays. The center section features an original decorative three-story metal fire escape that is accessed by a non-original window. Each story is punctuated by double hung windows that flank the fire escape. The outer window bays are framed by wood shutters. The third story is defined by two pairs of pilasters footed by a modest plaster scroll bracket on either side of the center bay. Two thin belt courses frame the third story of the building, and a set of decorative vents are placed above the outer window bays, while a single cartouche is placed above the center bay.

The secondary elevations that line the central recessed courtyard are punctuated by a variety of double-hung windows spaced in singles and pairs between the living units. Each story is accented by a thin belt course and capped by evenly spaced decorative vents.

The north and south secondary elevations are clad in coarse troweled stucco while the rear (east) elevation consists of coursed brick. The north and south elevations contain double-hung windows in single and pairs; the east elevation also features a ribbon of three windows. Each floor continues the belt courses from the primary elevations. A sidewalk lines the north, east, and south elevations.

Located at the northwest corner of the roof is an original large blade sign. Situated to face northwest, it reads "LA BERTHA", the historic name of the apartment building. The sign is composed of metal, plastic, and neon tube lighting, and is elevated by a metal structural system.

### B10. Significance, Continued:

center of Los Angeles' economic, social, and cultural capital of the time. The extension of local streetcar lines and the growing popularity of the automobile helped spur this development.

Wilshire Center is characterized by luxury examples of low- and mid-rise multiple family residential apartments constructed from the 1920s through the 1940s. As originally constructed, these buildings typically stood between three and eight stories and were built of brick or reinforced concrete in a variety of Period Revival styles, including the French Chateausque, Spanish Colonial Revival, Beaux Arts, and Italian Renaissance Revival. These styles reflected in the "exotic" names sometimes given to the buildings they adorned, such as the Piccadilly, Chalfonte, and Sire Frances Drake. Less elaborate apartment buildings provided gracious rental units to those with limited incomes, for whom grander apartment or home ownership was out of reach. One intact grouping of these multiple-family residential apartment buildings has been recognized as the NRHP-eligible Wilshire Center Apartment Historic District centered at S. Serrano Avenue and W. 9th Street.

(Continued)

## CONTINUATION SHEET

Page 4 of 6

Resource Name or #: Oxford Street Apartments/Verona Terrace Apartments/La Bertha

Recorded by: ICF International

Date: 5/19/2011

Continuation  Update

### B10. Significance, Continued:

The La Bertha was constructed in 1923 for owners C. H. Clay, John J. Hutchinson, and W. V. Clay, and designed by the architectural firm of Gable and Wyant. The building was situated near the intersection of Olympic Boulevard and Western Avenue in a formerly residential subdivision, known as the "Lewis Heights Tract," approximately three miles west of the city center and less than two miles from MacArthur Park. Ringed by street cars and bus lines, the location provided residents without automobiles convenient access to jobs and shopping in the downtown Los Angeles. Most immediately, the district was served by the Los Angeles Railway's L and S Lines. The L traveled from downtown along Olympic Boulevard.

The Lewis Heights Tract was first recorded in 1905 by investors Willis A. Lewis and A. H. Jeremy, who presumably intended to develop it as an exclusive neighborhood of single-family homes, similar to nearby tracts at the time. Some of the lots were improved with homes costing upwards of \$10,000. However, by the late 1910s and 1920s, much of the tract was redeveloped with multiple-family housing, due to the intense housing boom that followed the end of World War II that . The La Bertha is a singularly good example of this building trend.

The architectural firm of Gable and Wyant designed the La Bertha in a simplified interpretation of the Italian Renaissance Revival style. At three stories in height, the building accommodated 73 families in 146 rooms. An illustrated notice of the then-called "Oxford Street Apartments" appears prominently in the January 14, 1923 edition of the Los Angeles Times.

Gable and Wyant was well known in Los Angeles in the 1920s as an architectural firm that specialized in a wide range of commercial, institutional, and residential projects. They worked in a range of styles, including Colonial and Spanish Colonial Revival. The firm's institutional clients included wealthy communities, particularly the City of Beverly Hills, where they designed prominent civic works, notably the Beverly Hills Women's Club, the Beverly Hills Post Office, and Beverly Vista School. They were also prolific in the design of mid-rise or high-rise apartment buildings, with many located in the Wilshire District. Some of their commissions included the apartment building at 1839 S. Western Avenue (1923) with retail stores on the ground floor; 551 S. Oxford Avenue (1929), a four-story brick hotel blocks from the La Bertha; 755 S. Plymouth Avenue (1927), a two story apartment building; and the Crenshaw House (1925). Gable and Wyant residential commissions comprised several palatial private residences, including a "typical California Spanish home" that was planned to take "every advantage of the old trees that abound on the property... in order to enhance the California atmosphere of the architecture and add to the beauty of the setting." Commercial works included Hanger No. 1 at Los Angeles International Airport (1929) and a Spanish Colonial Revival style café, the Dyas-Carlton (1928), on the corner of Wilshire Boulevard and La Brea Avenue.

The La Bertha is an excellent example of the Italian Renaissance Revival executed in a low-rise multi-family apartment building. Italian Renaissance Revival elements of the three-and-one-half story U-shaped building are projecting wings that flank a relatively expansive courtyard garden, narrow vertically oriented windows, and false stepped hipped rooflines. Characteristic details of the style also include carved corbels, modillions, and clay pipe vents beneath the roofline. The building's site on an elevated lot, above the street grade and accessed by multiple flights of stairs, also contributes to its imposing and elegant appearance created by the primary façade, which is larger than most of the other buildings in the surrounding blocks.

The La Bertha located at 960 S. Oxford Avenue is a singularly good example of the development of multiple-family apartment buildings developed in the Wilshire Center area of Los Angeles in the 1920s. It is significant for its association with the prolific Los Angeles architectural firm of Gable and Wyant. Through the elaboration of its stylistic elements and design, the building conveys its significance as an excellent, intact example of the Italian Renaissance Revival. For these reasons, the La Bertha is considered eligible for listing in the NRHP under Criteria A and C at the local level of significance.

## CONTINUATION SHEET

Page 5 of 6

Resource Name or #: Oxford Street Apartments/Verona Terrace Apartments/La Bertha

Recorded by: ICF International

Date: 5/19/2011

Continuation  Update

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Gebhard, David and Robert Winter. *Los Angeles: An Architectural Guide*. Salt Lake City: Gibbs- Smith, Publisher, 1994

Historic Resources Group. Asbury Apartments: 2501-2505 W. 6th Street, Los Angeles, CA 90028 DPR 523 form. 7, 2002.

\_\_\_\_\_. Hotel Commodore: 1201-1203 W. 7th Street, Los Angeles, CA 90057. DPR 523 form. December 2001.

\_\_\_\_\_. Wilshire Center Apartment Historic District. DPR 523 form. 3 February 2006.

Los Angeles Times. "Home planned of Californian architecture." 29 March 1929.

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McWilliams, Carey. *Southern California: An Island on the Land*. Salt Lake City: Peregrine Smith Books, 1973.

Sitton, Tom and William Deverall, eds. *Metropolis in the Making: Los Angeles in the 1920s*. Berkeley: University of California Press, 2001.

# CONTINUATION SHEET

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Resource Name or #: Oxford Street Apartments/Verona Terrace Apartments/La Bertha

Recorded by: ICF International

Date: 5/19/2011

Continuation  Update

## Photographs, Continued:



West Elevation, Looking East at Center Section



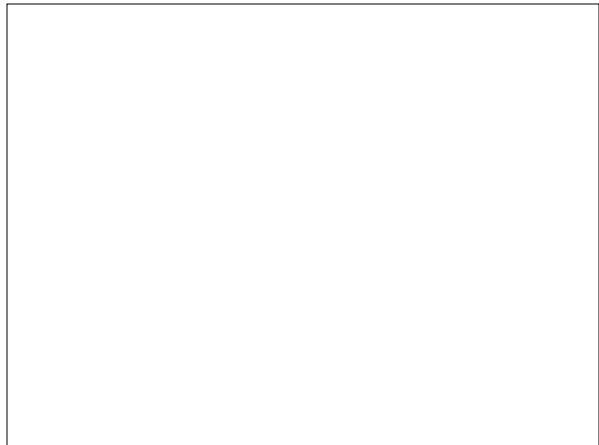
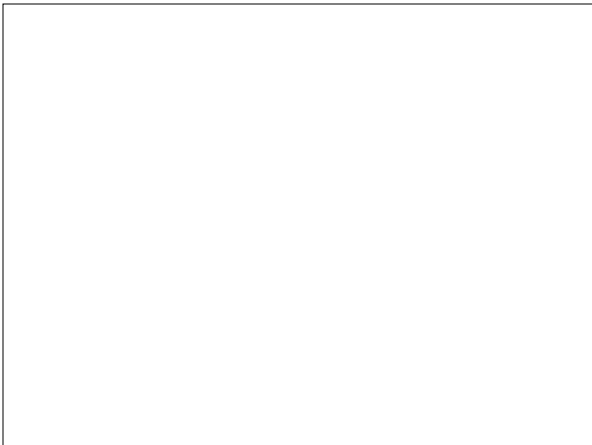
West Elevation, Looking Southeast at North Section



West Elevation, Looking Southeast



West Elevation, Detail of Front Entrance





**ENVIRONMENTAL ASSESSMENT FOR  
YOUNG BURLINGTON APARTMENTS PROJECT  
820 BURLINGTON AVENUE  
LOS ANGELES, CALIFORNIA 90017**

Prepared For:  
**Women Organizing Resources Knowledge and Services, Inc.**

Prepared By:  
**ICF International**

**February 2010**



# Environmental Assessment

**Responsible Entity:** California Tax Credit Allocation Committee (CTCAC)  
[24 CFR 58.2(a)(7)]

**Certifying Officer:** William J. Pavão, Executive Director, CTCAC [24 CFR 58.2(a)(2)]

**Project Name:** Young Burlington Apartments

**Estimated Total Project Cost:** \$11,006,655

**Grant Recipient:** 820 Burlington, L.P. [24 CFR 58.2(a)(5)]

**Recipient Address:** 1139 W. 6<sup>th</sup> Street, 2<sup>nd</sup> Floor, Los Angeles, CA 90017

**Project Representative:** Yoko Sugioka, Managing General Partner

**Telephone Number:** 213-202-3930

**Conditions for Approval:** *(List all mitigation measures adopted by the responsible entity to eliminate or minimize adverse environmental impacts. These conditions must be included in project contracts and other relevant documents as requirements).* [24 CFR 58.40(d), 40 CFR 1505.2(c)]

## I. Soil Suitability (Construction and Design)

The Project proponent shall implement the recommendations included in the Soil Investigation Report pertaining to the following issues (provided in Appendix H):

### **Foundation**

- a. Allowable bearing value (2,500 pounds per square foot)
- b. Lateral Design
- c. Foundation Settlement
- d. Footing Reinforcement (at least four No.4 bars or as deemed necessary by Structural Engineer)

### **Slabs on Grade**

- a. Concrete slabs (minimum thickness of 4 inches and cast over undisturbed soils)
- b. Slab reinforcement (at least No. 4 bars spaced 16 inches on centers)
- c. Moisture barrier (plastic membrane of 6 millimeters beneath slabs-on-grade)

### **Basement/Retaining Wall**

- a. Wall footings shall have same allowable bearing value as given for foundation
- b. Active earth pressures (retaining walls shall be designed to resist the lateral earth pressure of retained soils plus surcharge loads from adjacent structures).
- c. Wall drainage (Retaining walls shall be provided with perforated pipe and gravel subdrain)

- d. Wall backfill (temporary cut bank shall be cleared of loose materials and debris, proper compaction of backfill, backfill shall be placed in horizontal lifts not more than 8 inches in thickness). Pea gravel backfill shall be used where space limitations do not allow for conventional backfill (lifts of no more than 2 feet in thickness)
- e. Waterproofing of basement retaining walls

#### **Temporary Excavation**

- a. Temporary cuts to a depth ranging from 8 to 13 feet. Temporary cut with vehicular traffic load from alley shall be shored. No excavation during unfavorable weather. Plastic sheets shall be used to cover excavated banks when threatened by rain.

#### **Shoring**

- a. Soldier piles should have a minimum diameter of 12 inches
- b. Passive pressure given for lateral design shall be doubled if pile spacing on centers are greater than 3 times the pile diameter
- c. Shoring shall be designed so that the deflection does not exceed ¼ inch at the top of shoring. If greater deflection occurs during construction, additional bracing shall be provided.
- d. Monitoring of movements in the shoring system shall begin prior to the beginning of excavation and shall continue through backfilling activities.

#### **Corrosivity**

- a. Underground steel piping shall be blasted and given a high quality protective coating. Buried steel piping shall be electrically insulated from dissimilar metals

#### **Post-Grading**

- a. Site Drainage
  - Positive drainage devices such as sloping sidewalks, graded swales, and/or area drains shall be provided;
  - Where slabs or pavement slabs or pavement are feasible, ground surface shall be provided with a minimum gradient of 1% away from structure;
  - Water shall be transported off site in approved drainage devices or unobstructed swales.
  - Planting areas at grade should have positive drainage, exposed soil areas shall be above adjacent paved grades, planters shall not be depressed below adjacent paved grades unless provisions are made for drainage, and adequate drainage gradient shall be provided where planting areas are adjacent to pavement
  - Irrigation methods shall promote uniformity of moisture in planters and beneath adjacent flat-work. Over-and under-watering shall be avoided
  - All roof and wall surface drainage shall be collected and conducted by a non-erosive device to streets or other designated drainage areas.
- b. Trench backfill
  - Utility trench and/or structural backfill shall be placed by mechanical compaction to a minimum of 90 percent of laboratory maximum density
  - Where utility contractors indicate compaction equipment is undesirable, lightweight mechanical equipment and/or bedding of buried conduits shall be used or other method of trench compaction deemed appropriate by geotechnical consultant at the time of construction.
  - Where utility trenches are proposed parallel to building footings, the bottom of the trench shall not extend below 1 horizontal to 1 vertical plane project downward from the outside bottom edge of the adjacent footing.



## c. Geotechnical Inspection

- A geotechnical consultant shall inspect all temporary cuts, shoring, and foundation excavations.
- A geotechnical consultant shall inspect the finish grading, utility or other trench backfill, retaining wall backfill, or other earthwork completed for the proposed project.

In addition to the above mentioned mitigation measures, an Addendum to the Soils Investigation Report was prepared April 15, 2008 by Pacific Geotech Inc. The Addendum made the following additional recommendations to further prevent adverse conditions resulting from construction of the proposed project:

**Retaining Wall Design**

- a. Retaining walls shall be designed to resist the lateral earth pressure exerted by retained soils and seismic lateral earth pressure plus any surcharge loads from adjacent structures or vehicular traffic within a distance equal to the depth of the retaining wall
- b. Retaining walls that are free to rotate at the top shall be designed for an equivalent fluid pressure of 50 pounds per square foot per foot of depth as computed by the Mononobe-Okabe equation.
- c. Basement/retaining walls which are restrained against movement or rotation at the top shall be designed for 32H of trapezoidal earth pressure distribution.

**II. Noise (Construction Period)**

- All mobile or fixed noise-producing equipment used on the project that is regulated for noise output by a local, state, or federal agency shall comply with such regulation while in the course of project activity.
- Electrically powered equipment instead of pneumatic or internal combustion powered equipment shall be used, where feasible.
- Material stockpiles and mobile equipment staging, parking, and maintenance areas shall be located as far as practicable from noise-sensitive receptors.
- Construction site and haul-road speed limits shall be established and enforced during the construction period.
- The hours of construction, including noisy maintenance activities and all spoils and material transport, shall be restricted to the periods and days permitted by the local noise or other applicable ordinance. The only exception to this mitigation should be inaudible underground tunneling or similar construction activity. Noise-producing project activity shall comply with local noise control regulations affecting construction activity or obtain exemptions therefrom.
- The use of noise-producing signals, including horns, whistles, alarms, and bells shall be for safety warning purposes only.
- No project-related public address or music system shall be audible at any adjacent receptor.
- The onsite construction supervisor shall have the responsibility and authority to receive and resolve noise complaints. A clear appeal process to the Owner shall be established prior to construction commencement that will allow for resolution of noise problems that cannot be immediately solved by the site supervisor.
- Contract incentives may be offered to the construction contractor to minimize or eliminate noise complaints resulting from project activities where project construction would result in significant noise impacts.

### **III. Air Quality (Construction Period)**

- All unpaved demolition and construction areas shall be wetted at least twice daily during excavation and construction, and temporary dust covers shall be used to reduce dust emissions and meet SCAQMD District Rule 403. Wetting could reduce fugitive dust by as much as 50 percent.
- The owner or contractor shall keep the construction area sufficiently dampened to control dust caused by construction and hauling, and at all times provide reasonable control of dust caused by wind.
- All loads shall be secured by trimming, watering, or other appropriate means to prevent spillage and dust.
- All materials transported off site shall be either sufficiently watered or securely covered to prevent excessive amount of dust.
- All clearing, earth moving, or excavation activities shall be discontinued during periods of high wind (i.e., greater than 15 mph), so as to prevent excessive amounts of dust.
- General contractors shall maintain and operate construction equipment so as to minimize exhaust emissions.

### **IV. Air Pollution (Stationary)**

- An air filtration system shall be installed and maintained for the residences with filters meeting or exceeding the ASHRAE Standard 52.2 Minimum Efficiency Reporting Value (MERV) of 11, to the satisfaction of the Department of Building and Safety.

### **V. Fire Services**

The following recommendations of the Fire Department relative to fire safety shall be incorporated into the building plans:

- A plot plan shall be submitted for approval by the Fire Department either prior to the recordation of a final map or the approval of a building permit.
- The plot plan shall include the following minimum design features:
  - fire lanes, where required, shall be a minimum of 20 feet in width;
  - all structures must be within 300 feet of an approved fire hydrant; and
  - entrances to any dwelling unit or guest room shall not be more than 150 feet in distance in horizontal travel from the edge of the roadway of an improved street or approved fire lane.

### **VI. Recreation (Increase Demand for Parks, Recreational Facilities, or Cultural Facilities)**

- Per Section 17.12-A of the LA Municipal Code, the applicant shall pay the applicable Quimby fees for the construction of condominiums, or Recreation and Park fees for construction of apartment buildings.

### **VII. School Services**

- The applicant shall pay school fees to the Los Angeles Unified School District to offset the impact of additional student enrollment at schools serving the project area.

## VIII. Stormwater Runoff Management /Surface Water

Ordinance Nos. 172,176 and 173,494 specify Stormwater and Urban Runoff Pollution Control, which requires the application of Best Management Practices (BMPs). Chapter IX, Division 70 of the Los Angeles Municipal Code addresses grading, excavations, and fills. Applicants shall meet the requirements of the Standard Urban Stormwater Mitigation Plan (SUSMP) approved by Los Angeles Regional Water Quality Control Board, including the following (a copy of the SUSMP can be downloaded at <http://www.swrcb.ca.gov/rwqcb4/>):

- Project applicant shall implement stormwater BMPs to treat and infiltrate the runoff from a storm event producing  $\frac{3}{4}$  inch of rainfall in a 24-hour period. The design of structural BMPs shall be in accordance with the *Development Best Management Practices Handbook*, Part B Planning Activities. A signed certificate from a California licensed civil engineer or licensed architect that the proposed BMPs meet this numerical threshold standard is required.
- Post development peak stormwater runoff discharge rates shall not exceed the estimated pre-development rate for developments where the increased peak stormwater discharge rate will result in increased potential for downstream erosion.
- Trees and other vegetation shall be maximized at each site by planting additional vegetation, clustering tree areas, and promoting the use of native and/or drought tolerant plants.
- Any connection to the sanitary sewer must have authorization from the Bureau of Sanitation.
- Impervious surface area shall be reduced by using permeable pavement materials where appropriate, including: pervious concrete/asphalt; unit pavers, i.e., turf block; and granular materials, i.e., crushed aggregates, cobbles.
- Roof runoff systems shall be installed where site is suitable for installation. Runoff from rooftops is relatively clean, can provide groundwater recharge, and reduce excess runoff into storm drains.
- Messages shall be painted adjacent to storm drain inlets that prohibit the dumping of improper materials into the storm drain system. Prefabricated stencils can be obtained from the Department of Public Works, Stormwater Management Division.
- All storm drain inlets and catch basins within the project area shall be stenciled with prohibitive language (such as NO DUMPING—DRAINS TO OCEAN) and/or graphical icons to discourage illegal dumping.
- Signs and prohibitive language and/or graphical icons, which prohibit illegal dumping, shall be posted at public access points along channels and creeks within the project area.
- Legibility of stencils and signs shall be maintained.
- An efficient irrigation system shall be designed to minimize runoff including: drip irrigation for shrubs to limit excessive spray, shutoff devices to prevent irrigation after significant precipitation, and flow reducers.
- The owner(s) of the property shall prepare and execute a covenant and agreement (Planning Department General form CP-6770) satisfactory to the Planning Department binding the owners to post-construction maintenance on the structural BMPs in accordance with the Standard Urban Stormwater Mitigation Plan and/or per manufacturer's instructions.

## IX. Utilities (Local or Regional Water Supplies)

- The project shall comply with Ordinance No. 170,978 (Water Management), which imposes water conservation measures in landscape, installation, and maintenance (e.g., use drip irrigation and soak hoses in lieu of sprinklers to lower the amount of water lost to evaporation and overspray, set automatic sprinkler systems to irrigate during the early morning or evening hours to minimize water loss due to evaporation, and water less in the cooler months and during the rainy season).
- **All New Construction, Commercial/Industrial Remodel, Condominium Conversions, and Adaptive Reuse**

Unless otherwise required, and to the satisfaction of the Department of Building and Safety, the applicant shall install:

- a. High-efficiency toilets (maximum 1.28 gpf), including dual-flush water closets, and high-efficiency urinals (maximum 0.5 gpf), including no-flush or waterless urinals, in all restrooms as appropriate. Rebates may be offered through the Los Angeles Department of Water and Power to offset portions of the costs of these installations.
- b. Restroom faucets with a maximum flow rate of 1.5 gallons per minute.

Single-pass cooling equipment shall be strictly prohibited from use. Prohibition of such equipment shall be indicated on the building plans and incorporated into tenant lease agreements. (Single-pass cooling refers to the use of potable water to extract heat from process equipment—e.g., vacuum pump, ice machines—by passing the water through equipment and discharging the heated water to the sanitary wastewater system.)

- **All New Commercial and Industrial**

Unless otherwise required, all restroom faucets shall be of a self-closing design, to the satisfaction of the Department of Building and Safety.

- **Landscaping**

In addition to the requirements of the Landscape Ordinance, the landscape plan shall incorporate the following:

- a. Weather-based irrigation controller with rain shutoff
- b. Matched precipitation (flow) rates for sprinkler heads
- c. Drip/microspray/subsurface irrigation where appropriate
- d. Minimum irrigation system distribution uniformity of 75 percent
- e. Proper hydro-zoning, turf minimization and use of native/drought tolerant plant materials
- f. Use of landscape contouring to minimize precipitation runoff
- g. A separate water meter (or submeter), flow sensor, and master valve shutoff shall be installed for irrigated landscape areas totaling 5,000 sf. and greater, to the satisfaction of the Department of Building and Safety

**Finding:** [58.40(g)]

- Finding of No Significant Impact**  
(The project will not result in a significant impact on the quality of the human environment)
- Finding of Significant Impact**  
(The project may significantly affect the quality of the human environment)

Shilpa Trisal

**Preparer Signature:** \_\_\_\_\_ **Date:** 02/19/2010  
**Name/Title/Agency:** Shilpa Trisal, AICP/Senior Environmental Planner/ICF International

**RE Approving Official Signature:** \_\_\_\_\_ **Date:** \_\_\_\_\_  
**Name/Title/ Agency:** William J. Pavão/Executive Director/California Tax Credit Allocation Committee



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## Statement of Purpose and Need

*[40 CFR 1508.9(b)]*

The proposed development is located in the Westlake community, one of the most densely populated areas of the City of Los Angeles. Factors of overcrowding, unsafe living conditions, high poverty rate, along with limited private investment in the area has led to a demand for quality affordable housing.

The 2000 U.S. Census figures show that over 70% of the residents in the neighborhood surrounding the project site are Latino. Many of the neighborhood residents are monolingual (Spanish speaking), and the Westlake area is the most heavily transit dependent community in the City of Los Angeles. The area is further characterized with very low income levels for its residents, with 49.1% of the population living below the federal poverty line. The median household income was \$14, 817 per year. The low-income characteristics of the neighborhood residents have led to several social service providers locating within the area, and a need for additional affordable housing options. Women Organizing Resources Knowledge Services (Project Sponsor) is one such social service provider which seeks to provide quality affordable housing and enriched social service programs to communities in need.

The project site is located approximately 0.3 mile south of the MacArthur Park Red Line Station and approximately 0.2 mile north of the Olympic Boulevard Bus Station. Along with the nearby transit stations, the adjacent streets serve as a nexus point for public transportation. Regional and local bus lines have stops within one block of the project site. As a result, the location provides excellent access to public transportation for low-income residents who would reside at the development.

Based upon the characteristics of neighborhood residents and the lack of quality affordable housing in the area, the decision was made for the proposed development to focus on accommodating homeless, transitional age, and emancipated youths who lack the support necessary for a transition into adulthood. The development would provide 20 one-bedroom units for tenants and one two-bedroom unit for building management. Units would be income-restricted to youths earning 25% or less of the Area Median Income (AMI) of Los Angeles County.

The multiple modes of public transit, availability of cultural and social service providers, proximity to major employment centers, and abundance of other public amenities at this particular location have positioned this development to be a model for future development projects in the City.

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## Description of the Proposal

*Include all contemplated actions that are either geographically or functionally a composite part of the project, regardless of the source of funding. [24 CFR 58.32, 40 CFR 1508.25]*

The project site is located west of downtown Los Angeles, approximately 0.5 mile west of Interstate 110 in the community of Westlake (Figure 1). The site is comprised of a vacant parcel occupying a portion of the block bounded on the north by 8<sup>th</sup> Street, on the south by James M Wood Boulevard, on the west by Burlington Avenue, and on the east by Beacon Avenue (Figure 2). The gross project site area is 0.34 acres.

The project proposes construction of 21 one-bedroom affordable housing units for homeless youth with incomes at 25 percent of the area median income (AMI). The Young Burlington Apartments building would be a three-story structure over a subterranean parking garage containing 22 parking spaces. The building would be laid out in a U-shape around an open air courtyard located on the first floor and oriented along the southern property line. Vehicular access to the subterranean parking garage would be provided through the rear alley along the east side of the property (See Figure 2). Pedestrian access to the residential parking level and the upper housing levels would be provided by a private elevator accessible from the first floor courtyard. The main entrance to the courtyard and housing units would be made available from Burlington Avenue. Residential amenities include two community/multipurpose lounge rooms on the first floor, a computer lab, a laundry room, and outdoor balcony/patio space for each housing unit.

At the ground floor level, one two-bedroom housing unit, measuring approximately 1,090 square feet would be constructed near the front entrance for the building manager. Two other one-bedroom housing units, each measuring between 485 and 500 square feet, would be constructed for tenants. The remaining 2,400 square feet of the ground level would be comprised of the laundry room (approximately 320 square feet), two community/multipurpose lounge rooms (approximately 500 square feet each), and the common/community space which includes the open air courtyard and offices (approximately 1,090 square feet total). The second and third floors shall be comprised of nine one-bedroom residential units on each floor, measuring between 500 and 550 square feet per unit. The housing units shall be designed with ample storage space, a range and refrigerator, and a full bathroom. The entire building shall be wheelchair accessible and kitchens in all units shall be adaptable to wheelchair-bound tenants. In addition, to providing affordable housing, the Young Burlington Apartments would also house support services offices, providing services such as life skill training, job training, money management, health education, and drug and alcohol addiction attenuation.

The site is currently vacant and covered in native vegetation including grass, bushes, and four palm trees approximately 25 feet in height (one of which appeared to be dead). The remnants of a concrete driveway, a concrete patch, and an asphalt-paved area are also present on the project site. The project site is surrounded predominantly by multi-family residential uses of mixed density to the north, south, east, and west.

Construction of the proposed project is expected to begin in March 2010 and end in March 2011. The City of Los Angeles prepared a Categorical Exemption (CE) under CEQA in March 2007 for the proposed project. A copy of the Notice of Exemption filed at the Los Angeles County Clerk's office is provided in Appendix A.



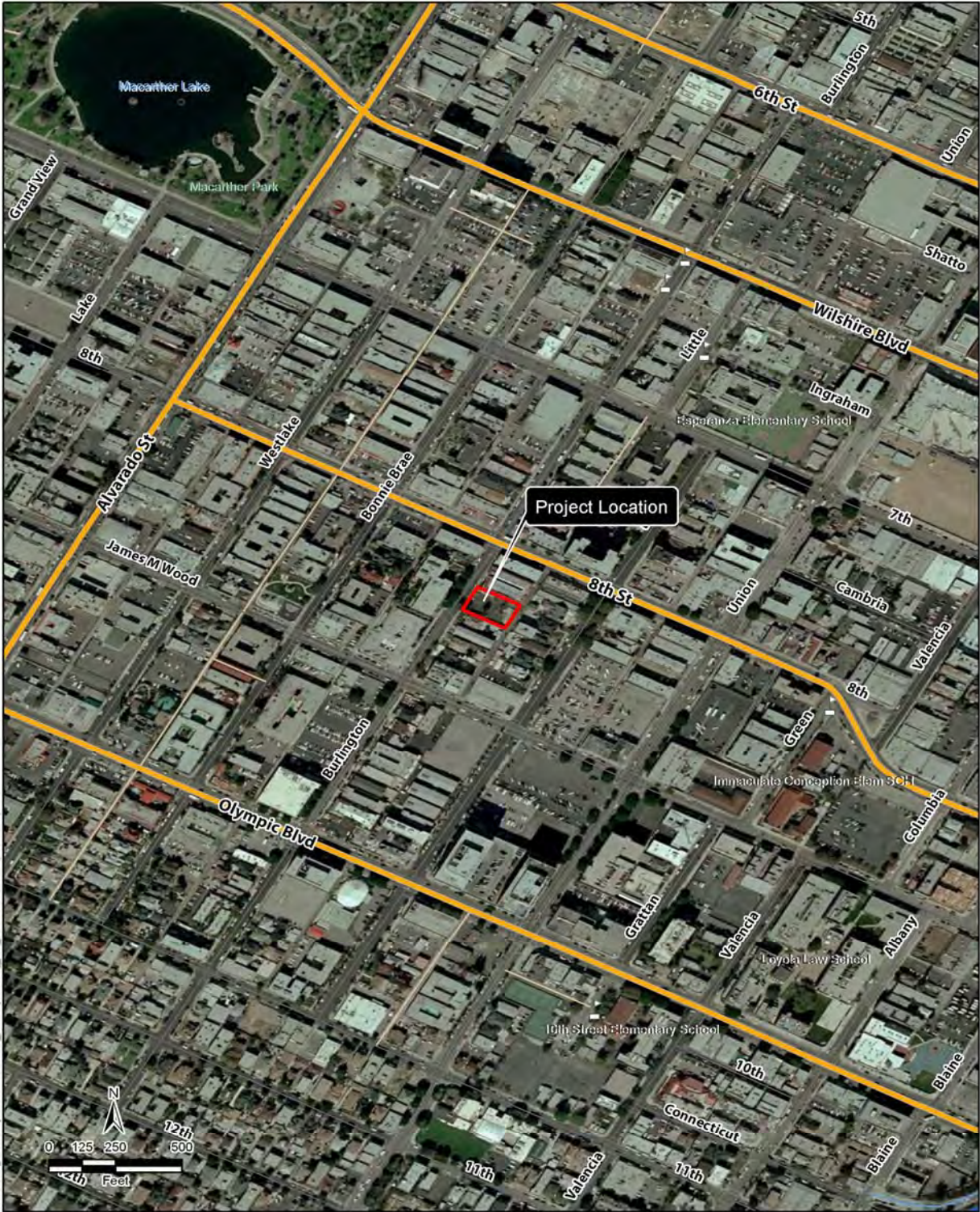
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SOURCE: ESRI Streetmap USA (2007)

**Figure 1**  
**Regional Location**







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SOURCE: ESRI Streetmap USA (2008)



Figure 2  
Project Vicinity





**Figure 3**  
**Rendering of Proposed Project**

*Source: Women Organizing Resources Knowledge Services; ICF International 2010. Young Burlington Apartments Project, Los Angeles, California.*

## Existing Conditions and Trends

*Describe the existing conditions of the project area and its surroundings, and trends likely to continue in the absence of the project. [24 CFR 58.40(a)]*

The project site currently consists of a vacant parcel, located at 820 Burlington Avenue, situated between a large apartment complex and a single-family residence on the east side of Burlington Avenue (Photo 1). No structures exist on the site and the property is covered in native vegetation including grass, bushes, and four palm trees approximately 25 feet in height, one of which appears to be dead (Photo 2). The remnants of a concrete driveway are located at the northwest corner of the property (Photo 3) and a concrete patch is located near the eastern property boundary (Photo 4). According to the Phase I Environmental Site Assessment prepared for the proposed project by LFR Environmental Management and Consulting Engineering, an asphalt-paved area at the southeast corner of the site appears to contain white lines indicating previous use as a parking lot (Appendix B). The Site is characterized by uneven terrain that is raised above street level (with the exception of the asphalt-paved area) and bordered by chain-link fencing which surrounds the entire property (Photo 5).

The City of Los Angeles General Land Use Map (revised November 20, 2007) designates the project site for Medium Residential land use. According to the City of Los Angeles Zoning Information and Map Access System (ZIMAS), the project site is zoned a “R3-1” residential zone. Pursuant to the Los Angeles Municipal Code (LAMC), the site’s zoning of R3-1 permits a residential development with a maximum height of 45 feet, a minimum density of one unit per 800 square feet, front and rear yards of 15 feet and side yards of not less than 5 feet. Adjacent land uses include large apartment developments to north and west, marked 806 South Burlington Avenue and 817 South Burlington Avenue, respectively (Photos 6). To the south of the project site is a single-family residence marked 826 South Burlington Avenue. East of the project site is an alley which is accessible to the public at all times and provides some parking and access to multi-family residential buildings along Beacon Avenue (Photo 7). The remaining land uses along Burlington Avenue follow a similar pattern of multi-family residences including apartments and a large convalescent home located on southwest corner of the block at the Burlington Avenue/James M. Wood Boulevard intersection. Land uses along 8<sup>th</sup> Street to the north, and James M. Wood Boulevard to the south, are primarily local-serving retail, such as mini-markets, convenience stores, and independent retail stores. The project site is located in the Community Redevelopment Agency’s Westlake Recovery Redevelopment Project Area and is within the City’s Designated State Enterprise Zone.



**Photo 1: Project Site —View Eastward from West Side of Burlington Avenue**

*Source: ICF International, February 2010.*





**Photo 2: Project Site Address—View Eastward from Western Property Line**

*Source: ICF International, February 2010.*





**Photo 3: Remnants of Concrete Driveway on the Northwest Corner of the Project Site—  
View Eastward from Western Property Line of the Project Site**

*Source: LFR. Environmental Management & Consulting Engineering, Phase I Environmental Site Assessment for 820 Burlington Avenue, Updated December 2009.*



**Photo 4: Rear Asphalt-Paved Area—View Southwest from Rear Alley East of the Project Site**

*Source: ICF International, February 2010.*





**Photo 5: Asphalt-Paved Area at Street Level with Retaining Wall for Uneven Terrain—  
View Looking West from Rear Alley**

*Source: ICF International, February 2010.*



**Photo 6: Apartment Complex (806 Burlington Avenue) and Adjacent Land Uses North of the Project Site—View Looking South from Northwest Corner of Burlington Avenue/ 8<sup>th</sup> Street Intersection**

*Source: ICF International, February 2010.*





**Photo 7: Rear Alley Located East of the Project Site—View Looking North from James M. Wood Boulevard**

*Source: ICF International, February 2010.*



Hope and Peace Pocket Park and MacArthur Park are the only public park facilities located within ½ mile of the project site. Hope and Peace Pocket Park is located approximately 500 feet to the west of the site, at the intersection of Bonnie Brae Street and James M. Wood Boulevard. MacArthur Park is located approximately 0.3 mile northwest of the project site, west of Alvarado Street. MacArthur Park Lake, a man-made lake located in the middle of the park, is the only water body in the project vicinity.

Camino Nuevo Charter Academy is located one block east of the project site. Other educational facilities within ½ mile of the project site include MacArthur Park Primary Center, Esperanza Elementary School, Charles White Elementary School, Camino Nuevo Charter Academy, John H. Liechty Middle School, Los Angeles Academy of Arts and Enterprise, McAlister High School, Belmont Senior High School, and Design High School. There are also a number of vocational schools located in the vicinity of the project site.

The project area is served by the Los Angeles Police Department Rampart Community Police Station at 1401 W. 6th Street. Los Angeles Fire Department Station No. 11 is located approximately 1,000 feet to the north of the project site at 1819 West 7th Street.

Interstate 110 is the closest highway or freeway to the site and is located approximately 0.5 mile to the east. The Westlake community is well served by public transit services provided by Metro and the City of Los Angeles Department of Transportation (LADOT). Two Metro bus stops are located just north of the project site at the intersection of 8th Street and Burlington Avenue serving Metro lines 66/366. Several Metro and LADOT bus routes have stops immediate to the project site. Santa Monica Municipal Airport (SMO) and Los Angeles International Airport (LAX) are the closest airports to the project site. SMO is approximately 10 miles to the west, and LAX is approximately 10 miles to the southwest. The project is not within the Runway Clear Zone (RCZ) for either airport.

The project site is within the Westlake Community Plan area, which is located just west of Downtown Los Angeles and contains 1,900 acres (City of Los Angeles 1997, 2008). It is bounded on the north by Temple Street, on the west by Hoover Street, on the south by Washington Boulevard, and on the east by Interstate 110. Based on the current Community Plan demographic section, the population of the Westlake Community Plan area is projected to reach 124,040 in 2010, with an estimated growth rate of 8.2% over the last decade. Median household income in the Community Plan area has traditionally been substantially lower than the median household income throughout the rest of the City. The proposed project would add new affordable housing units and stimulate economic commercial activity at the project site.

The Community Plan area will likely continue to grow in the absence of the project. However, without the project, the project site's neighborhood would not benefit from the additional 21 affordable housing units resulting from the project. In the absence of the project, the project site will continue to be vacant and undeveloped.

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## Statutory Checklist

*[24CFR §58.5] Record the determinations made regarding each listed statute, executive order or regulation. Provide appropriate source documentation. [Note reviews or consultations completed as well as any applicable permits or approvals obtained or required. Note dates of contact or page references.] Provide compliance or consistency documentation. Attach additional material as appropriate. Note conditions, attenuation or mitigation measures required.*

<b>Factors</b>	<b>Determination and Compliance Documentation</b>
<p><b>Historic Preservation</b> [36 CFR 800]</p>	<p>Compliance steps are not invoked. ICF Jones &amp; Stokes conducted a review of the proposed project under Section 106 of the National Historic Preservation Act (Appendix C). The review found 11 properties in the Area of Potential Effects (APE) that are at least 50 years of age or older. None of these properties were listed in the California State Historic Resources Inventory; however, seven properties in the APE were determined to be eligible for listing in the National Historic Register of Historic Places (NRHP) as contributors to an eligible NRHP historic district, the Beacon Avenue Historic District. The Section 106 Review prepared by ICF Jones &amp; Stokes concluded that the proposed project site is not part of the Beacon Avenue Historic District and the proposed undertaking does not pose an adverse effect to any identified Historic Properties. The proposed new construction would have a height and massing that is consistent with the character of the neighborhood and therefore would have no direct physical impact on the Historic Properties, and minimal indirect effects due to the location of the property and the character of the surrounding neighborhood.</p> <p>Because the proposed project involves ground-disturbing activities, a Cultural Resources Records Search Quick Check was conducted by the South Central Coastal Information Center of the California Historical Resources File System at the California State University, Fullerton. The Quick Check recommended that a Phase I archaeological survey be completed. On July 23, 2007, the City requested comments of the State Historic Preservation Officer (SHPO) under Stipulation X.D of the Programmatic Agreement (PA). According the Section 106 Review prepared for the proposed project, because the SHPO did not respond to the request for comment within the 30 days allotted under the PA, the City may assume that the SHPO does not object to any action deemed appropriate by the City and under Stipulation X.D.2 of the PA, no further consideration of archaeological resources by the City is required.</p>
<p><b>Floodplain Management</b> [24 CFR 55, Executive Order 11988]</p>	<p>Compliance steps are not invoked. The proposed project site is not located within a 100-year or 500-year floodplain. The proposed project site is located in Zone X as identified on the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM) Number 06037C1620F, effective September 26, 2008 (Appendix D). Zone X refers to areas outside of the 0.2% annual chance floodplain and describes areas with a minimal risk of flood. The nearest flood zone is located in MacArthur Park, approximately 0.3 mile northwest of the project site,</p>

Factors	Determination and Compliance Documentation
	<p>which is identified as a Flood Zone A. Zone A refers to areas subject to inundation by a 1% annual chance of flood. However, MacArthur Park would not pose a risk of flooding to the project site due to its relatively distant location.</p>
<p><b>Wetlands Protection</b> [Executive Order 11990]</p>	<p>Compliance steps are not invoked. The project is located approximately 0.3 mile southeast of MacArthur Park which contains a freshwater pond designated by the U.S. Fish and Wildlife Service as a Type 5 shallow open water pond (PUBHx) water body. This designation describes permanently flooded palustrine wetlands with unconsolidated bottoms, which have been excavated. However, the project site is located in a highly urbanized area where there are no sensitive riparian or wetland habitats. The freshwater pond in MacArthur Park would be unlikely to support wildlife or sensitive vegetation as it is used in an open space public park. Construction activities would not affect the nearby pond at MacArthur Park due to the project's relatively distant location and intervening urban developments. These findings are based on a search conducted February 10, 2010, using the <i>Wetlands Online Mapper</i> of the U.S. Fish and Wildlife Service (<a href="http://wetlandsfws.er.usgs.gov/imf/imf.jsp?site=NWI_CONUS">http://wetlandsfws.er.usgs.gov/imf/imf.jsp?site=NWI_CONUS</a>).</p>
<p><b>Coastal Zone Management Act</b> [Sections 307(c), (d)]</p>	<p>Compliance steps are not invoked. The project site is not located within a coastal zone, as identified on the Local Coastal Program (LCP) Status Maps for the South Coast areas, effective July 1, 2009 (<a href="http://www.coastal.ca.gov/lcp/lcpstatus-map-sc.pdf">http://www.coastal.ca.gov/lcp/lcpstatus-map-sc.pdf</a>) and confirmed on the site's ZIMAS information page (<a href="http://zimas.lacity.org/report_pin.asp">http://zimas.lacity.org/report_pin.asp</a>).</p>
<p><b>Sole Source Aquifers</b> [40 CFR 149]</p>	<p>Compliance steps are not invoked. The project is located in Los Angeles County which is not one of the three counties (Fresno, Santa Cruz, and Butte Counties) in California that contain designated sole-source aquifers. These findings are based on a review conducted February 11, 2010, of the EPA website (<a href="http://www.epa.gov/safewater/sourcewater/pubs/qrg_ssamap_reg9.pdf">http://www.epa.gov/safewater/sourcewater/pubs/qrg_ssamap_reg9.pdf</a>).</p>
<p><b>Endangered Species Act</b> [50 CFR 402]</p>	<p>Compliance steps are not invoked. A review of the California Department of Fish and Game California Natural Diversity Database (CNDDDB) was conducted on February 12, 2010. According to the review there is presence, within 0.25 mile of the project site, of three species listed as either endangered or threatened on either the federal or state endangered species lists. The CNDDDB search found that there is the potential for the following endangered or threatened species to be present on the project site: burrowing owl (<i>Athene cunicularia</i>), southwestern willow flycatcher (<i>Empidonax traillii extimus</i>), and the American badger (<i>Taxidea taxus</i>). (See Appendix E)</p> <p>The proposed project is located in a fully developed urban area; therefore, few suitable open space habitats are available for wildlife in the immediate vicinity of the project site. No impacts related to habitats or endangered or threatened species are expected to occur as construction shall take place on a previously developed parking lot where no suitable wildlife habitat exists.</p>



Factors	Determination and Compliance Documentation
<p><b>Wild and Scenic Rivers Act</b> [Sections 7 (b), (c)]</p>	<p>Compliance steps not invoked. Neither the City of Los Angeles nor the State of California contain any listed wild and/or scenic rivers in the National Wild and Scenic Rivers System. The closest river to the project site is the Los Angeles River located approximately 2.6 miles east of the project site; however, the Los Angeles River contains numerous man-made features and little scenic value making it ineligible for inclusion in the National Wild and Scenic Rivers System. Therefore, the project would not have an effect on the natural, free flowing, or scenic qualities of a river in the National Wild and Scenic Rivers System. These findings are based on a review of the National Wild and Scenic Rivers website, last modified on April 17, 2009. Available: <a href="http://www.nps.gov/nrcr/programs/pwsr/index.htm">http://www.nps.gov/nrcr/programs/pwsr/index.htm</a>.</p>
<p><b>Air Quality</b> [Clean Air Act, Sections 176 (c) and (d), and 40 CFR 6, 51, 93]</p>	<p>Compliance steps are not invoked. Per guidelines set forth by the U.S. Department of Housing and Urban Development (HUD), because the proposed project is in a non-attainment area for ozone (O<sub>3</sub>) and particulate matter (PM<sub>10</sub> and PM<sub>2.5</sub>), conformity with the State Implementation Plan (SIP) must be demonstrated. A project is shown to conform with the SIP if its criteria pollutant emissions remain below the local air district's significance thresholds and it is consistent with the local Air Quality Management Plan (AQMP).  Based on an Air Quality Technical Memorandum (included as Appendix F), the proposed project's criteria pollutant emissions would be below the local air district's significance thresholds, and the project would be consistent with the AQMP. Therefore, no adverse effects would result.</p>
<p><b>Farmland Protection Policy Act</b> [7 CFR 658]</p>	<p>Compliance steps are not invoked. The proposed project site does not include prime or unique farmland, or other farmland of statewide or local importance. These findings are based on a review conducted February 10, 2010, of the State Farmland Mapping and Monitoring Program maps for the County of Los Angeles. Available: (<a href="ftp://ftp.consrv.ca.gov/pub/dlrp/FMMP/pdf/2006/los06.pdf">ftp://ftp.consrv.ca.gov/pub/dlrp/FMMP/pdf/2006/los06.pdf</a>).</p>
<p><b>Environmental Justice</b> [Executive Order 12898]</p>	<p>The project is expected to result in beneficial effects on low-income and minority communities by increasing the supply of low-income housing in the community. The project is not expected to result in gentrification or increase in property values such that it would result in changes in the community's demographic character. The proposed use, size, and character of the building would be consistent with the surrounding neighborhood and would not result in a dramatic alteration of the demographic or socioeconomic character the surrounding area. The residential opportunities presented by the project would be beneficial as it would bring new affordable housing for transitional age youth, many of whom are of a racial or ethnic minority background and earn 25% of the area median income. In addition, the proposed project would provide free volunteer-based support services such as life skill training, job training, money management, health education, and drug and alcohol attenuation.</p>

<b>HUD Environmental Standards</b>	<b>Determination and Compliance Documentation</b>
<p><b>Noise Abatement and Control</b> [24 CFR 51 B]</p>	<p>The project site is subject to noise typical of an urban neighborhood. The most common noise source at the project site is traffic along adjacent streets and alleys. Typical traffic noise results from automobiles, buses, trucks, and emergency vehicles with siren operation.</p> <p>The proposed project is a multi-family residential development, which is a uses that is compatible with surrounding medium density residential uses.</p> <p>Based upon traffic data in the LADOT database, a noise assessment in accordance with HUD’s Noise Guidebook was prepared by the City of Los Angeles in August 2007. The noise assessment has revealed a projected DNL (Day-night average sound level, also referred to as Ldn) of 64.5 dB for the year 2017 at the project site (Appendix G). A DNL below 65 decibel (dB) is considered an “Acceptable” noise environment under HUD noise standards as per 24 CFR 51, and requires no additional noise attenuation measures. The proposed project would be constructed in conformance with the Noise Insulation Standards of Title 24 of the California Building Code which requires an interior noise level of 45 dB Ldn/DNL and would ensure an acceptable interior noise environment. As such, the proposed project would be in compliance with HUD standards for noise abatement and control. See “Noise” below under the Land Development checklist section for discussion of construction noise.</p>
<p><b>Toxic/Hazardous/Radio active Materials, Contamination, Chemicals or Gases</b> [24 CFR 58.5(1)(2)]</p>	<p>A Phase I report was prepared by LFR Environmental Management and Consulting Engineering in December 2009 for the project site. This Phase I report updated the original report prepared in 2006 and two subsequent Phase I reports prepared in 2007 and 2008.</p> <p>The December 2009 Phase I included a review of an EDR radius map regulatory database report. Other historical records, such as historical aerial photographs, were not obtained as they were discussed and presented in the original 2006 Phase I. According to LFR’s original report, groundwater is inferred to flow to the southwest.</p> <p>On-site conditions have not changed since completion of the original Phase I and the subsequent reports. The site is currently vacant land, and was vacant land in 2006, 2007 and 2008 when the original, update, and update 2 reports were conducted. Additionally, the December 2009 Phase I concluded that there did not appear to be any adverse impacts to the site from adjoining properties or vice versa.</p> <p>According to the December 2009 Phase I, the EDR report was reviewed for local, state, and federal listings for properties within the site vicinity. Regulatory database lists were reviewed for cases pertaining to leaking USTs and ASTs, hazardous waste sites, and abandoned sites within the specified radii of standards established by ASTM. The information provided by EDR and the reported groundwater flow direction (toward the southwest) were used in this assessment. The current EDR report is similar to the 2008 EDR report; no off-site listings that would appear to present a</p>

<b>HUD Environmental Standards</b>	<b>Determination and Compliance Documentation</b>
	<p>potential environmental issue for the site were identified. No new listings were identified in the EDR report obtained in 2009 that would present a concern to the site.</p> <p>Based on the Phase I ESA, LFR concluded that there are no environmental concerns associated with the site. Therefore, LFR recommended no further action or investigation regarding the site.</p>
<p><b>Siting of HUD-Assisted Projects near Hazardous Operations</b> [24 CFR 51 D]</p>	<p>Compliance steps are not invoked. The subject property is not located within the immediate vicinity of hazardous industrial operations handling fuel or chemicals of an explosive or flammable nature. According to HUD, threshold properties that are located near hazardous industrial operations handling fuels or chemicals of an explosive or flammable nature are subject to HUD safety standards (24 CFR 51, Subpart C). In the case of tanks containing common liquid fuels, the requirement for an acceptable separation distance (ASD) calculation only applies to storage tanks that have a capacity of more than 100 gallons.</p> <p>According to the Phase I Environmental Site Assessment prepared for the project site, no facilities that handle the above mentioned explosive or flammable hazardous chemicals exist on or in the immediate vicinity of the project site. No off-site listings that would appear to present a potential environmental issue for the site were identified in the Phase 1 Report. Additionally, no new listings were identified that would present a concern to the site.</p>
<p><b>Airport Clear Zones and Accident Potential Zones</b> [24 CFR 51 D]</p>	<p>Compliance steps are not invoked. The subject property is not located within 2,500 feet of the end of a civil airport runway or 8,000 feet of the end of a military airfield runway, as required for HUD-funded projects. There are no airports located within the vicinity of the project site. the nearest airports are Los Angeles International Airport, located approximately 17 miles southwest of the project site and Santa Monica Municipal Airport located approximately 10 miles west of the site.</p>

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## Environmental Assessment Checklist

*[Environmental Review Guide HUD CPD 782.24 CFR 58.40; Ref. 40 CFR 1508.8 & 1506.27]*

*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. Then 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.*

Land Development	Code	Source or Documentation
Conformance with Comprehensive Plans and Zoning	1	<p>The General Plan land use designation for the project site is Medium Residential (Residential), and the zoning is R3-1. The proposed project involves a residential development on a site planned and zoned for residential uses. According to the Los Angeles Municipal Code (2009) a multi-family use is permitted under the R3-1 zone with requirements or restrictions upon height (45 feet), density (minimum of one dwelling unit per 800 square feet), and yard space (front and rear yards to a minimum of 15 feet and side yards to a minimum of 5 feet).</p> <p>The proposed project would construct a three story building containing 20 one-bedroom apartment units each measuring between approximately 485 and 550 square feet square feet, one two-bedroom apartment unit measuring approximately 1,090 square feet, and a subterranean parking garage containing 22 parking spaces for tenants. The maximum height of the proposed structure would be approximately 36 feet and 9 inches above ground level, which is within the maximum allowed height for R3-1 zones. Front and rear yard setbacks would both be over 15 feet from the property line and side yard would be setback 6 feet. The project proponent is allowed approximately 19.75 dwelling units on the site (approximately 15,800 square feet) as per Los Angeles Municipal Code; however, with the added 35% density bonus for low-income housing projects, as per California SB1818, the project proponent would be allowed approximately 26 housing units As such, the proposed project would be consistent with the City's comprehensive plans and zoning.</p>



Land Development	Code	Source or Documentation
Compatibility and Urban Impact	1	The proposed project would include residential uses with associated parking uses. Adjacent uses include multi-family residential (apartment) uses to the north and south. An alley that is accessible to the public is located immediately east of the project site. A single family residence is located south of the project site at 826 South Burlington Avenue. The proposed project would be compatible with nearby existing urban uses.
Slope	1	According to Exhibit C of the Safety Element of the City's General Plan, the project site is not located in an area designated at risk of landslide. Project construction activities are not expected to increase the risk of landslide at the site, and all grading and building activities will be in compliance with the City's Building and Grading codes.
Erosion	4	The grading of the site would result in the loss of topsoil; however, this effect will be reduced by the incorporation of construction-period mitigation measures as listed in the Air Quality section. Wind erosion may also result in the loss of top soil during construction; however, this effect can be mitigated by incorporation of the short-term construction mitigation measures listed in the Air Quality section below. All construction activity would proceed in compliance with standard City requirements and Los Angeles Regional Water Quality Control Board regulations to limit erosion during construction. The project would include all necessary improvements, including stormwater runoff controls to accommodate and direct stormwater to local and regional drainage facilities. Implementation of applicable stormwater regulations will further minimize erosion from the site.
Soil Suitability	4	A Soil Investigation Report was prepared for the project site by Pacific Geosoils in September 2006 (Appendix H). The project site is located in southern California, which is subject to strong periodic seismic ground shaking due to local and regional geology. The site is not located in an Alquist-Priolo zone. <sup>1</sup> The closest fault is the Hollywood Fault, located approximately 4 miles north of the site. <sup>2</sup> Additionally, according to the soil investigation report prepared for the proposed project, the site is not located within a liquefaction zone.

<sup>1</sup> Pacific Geosoils Inc., *Report of Soils Investigation: 820 South Burlington Avenue*. September 2006.

<sup>2</sup> Ibid.

Land Development	Code	Source or Documentation
		<p>The following mitigation measures are recommended in the soil investigation report to prevent adverse conditions resulting from construction of the proposed project.</p> <p style="text-align: center;"><b>Mitigation Measures</b></p> <ul style="list-style-type: none"> <li>• The Project proponent shall implement the recommendations included in the Soil Investigation Report pertaining to the following issues:               <p style="text-align: center;"><b><u>Foundation</u></b></p> <ol style="list-style-type: none"> <li>a. Allowable bearing value (2,500 pounds per square foot)</li> <li>b. Lateral Design</li> <li>c. Foundation Settlement</li> <li>d. Footing Reinforcement (at least four No.4 bars or as deemed necessary by Structural Engineer)</li> </ol> <p style="text-align: center;"><b><u>Slabs on Grade</u></b></p> <ol style="list-style-type: none"> <li>a. Concrete slabs (minimum thickness of 4 inches and cast over undisturbed soils)</li> <li>b. Slab reinforcement (at least No. 4 bars spaced 16 inches on centers)</li> <li>c. Moisture barrier (plastic membrane of 6 millimeters beneath slabs-on-grade)</li> </ol> <p style="text-align: center;"><b><u>Basement/Retaining Wall</u></b></p> <ol style="list-style-type: none"> <li>a. Wall footings shall have same allowable bearing value as given for foundation</li> <li>b. Active earth pressures (retaining walls shall be designed to resist the lateral earth pressure of retained soils plus surcharge loads from adjacent structures).</li> <li>c. Wall drainage (Retaining walls shall be provided with perforated pipe and gravel subdrain)</li> <li>d. Wall backfill (temporary cut bank shall be cleared of loose materials and debris, proper compaction of backfill, backfill shall be placed in horizontal lifts not more than 8 inches in thickness). Pea gravel backfill shall be used where space limitations do not allow for conventional backfill (lifts of no more than 2 feet in thickness)</li> <li>e. Waterproofing of basement retaining walls</li> </ol> </li> </ul>

Land Development	Code	Source or Documentation
		<p style="text-align: center;"><b><u>Temporary Excavation</u></b></p> <p>a. Temporary cuts to a depth ranging from 8 to 13 feet. Temporary cut with vehicular traffic load from alley shall be shored. No excavation during unfavorable weather. Plastic sheets shall be used to cover excavated banks when threatened by rain.</p> <p style="text-align: center;"><b><u>Shoring</u></b></p> <p>a. Soldier piles should have a minimum diameter of 12 inches</p> <p>b. Passive pressure given for lateral design shall be doubled if pile spacing on centers are greater than 3 times the pile diameter</p> <p>c. Shoring shall be designed so that the deflection does not exceed ¼ inch at the top of shoring. If greater deflection occurs during construction, additional bracing shall be provided.</p> <p>d. Monitoring of movements in the shoring system shall begin prior to the beginning of excavation and shall continue through backfilling activities.</p> <p style="text-align: center;"><b><u>Corrosivity</u></b></p> <p>a. Underground steel piping shall be blasted and given a high quality protective coating. Buried steel piping shall be electrically insulated from dissimilar metals</p> <p style="text-align: center;"><b><u>Post-Grading</u></b></p> <p>a. Site Drainage</p> <ul style="list-style-type: none"> <li>• Positive drainage devices such as sloping sidewalks, graded swales, and/or area drains shall be provided;</li> <li>• Where slabs or pavement slabs or pavement are feasible, ground surface shall be provided with a minimum gradient of 1% away from structure;</li> <li>• Water shall be transported off site in approved drainage devices or unobstructed swales.</li> <li>• Planting areas at grade should have positive drainage, exposed soil areas shall be above adjacent paved grades, planters shall not be depressed below adjacent paved grades unless provisions are made</li> </ul>

Land Development	Code	Source or Documentation
		<p>for drainage, and adequate drainage gradient shall be provided where planting areas are adjacent to pavement</p> <ul style="list-style-type: none"> <li>• Irrigation methods shall promote uniformity of moisture in planters and beneath adjacent flat-work. Over-and under-watering shall be avoided</li> <li>• All roof and wall surface drainage shall be collected and conducted by a non-erosive device to streets or other designated drainage areas.</li> </ul> <p>b. Trench backfill</p> <ul style="list-style-type: none"> <li>• Utility trench and/or structural backfill shall be placed by mechanical compaction to a minimum of 90 percent of laboratory maximum density</li> <li>• Where utility contractors indicate compaction equipment is undesirable, lightweight mechanical equipment and/or bedding of buried conduits shall be used or other method of trench compaction deemed appropriate by geotechnical consultant at the time of construction.</li> <li>• Where utility trenches are proposed parallel to building footings, the bottom of the trench shall not extend below 1 horizontal to 1 vertical plane project downward from the outside bottom edge of the adjacent footing.</li> </ul> <p>c. Geotechnical Inspection</p> <ul style="list-style-type: none"> <li>• A geotechnical consultant shall inspect all temporary cuts, shoring, and foundation excavations.</li> <li>• A geotechnical consultant shall inspect the finish grading, utility or other trench backfill, retaining wall backfill, or other earthwork completed for the proposed project.</li> </ul> <p>In addition to the above mentioned mitigation measures, an Addendum to the Soils Investigation Report was prepared April 15, 2008 by Pacific Geotech Inc. The Addendum made the following additional recommendations to further prevent adverse conditions resulting from construction of the proposed project:</p>

Land Development	Code	Source or Documentation
		<p style="text-align: center;"><b>Retaining Wall Design</b></p> <ul style="list-style-type: none"> <li>• Retaining walls shall be designed to resist the lateral earth pressure exerted by retained soils and seismic lateral earth pressure plus any surcharge loads from adjacent structures or vehicular traffic within a distance equal to the depth of the retaining wall</li> <li>• Retaining walls that are free to rotate at the top shall be designed for an equivalent fluid pressure of 50 pounds per square foot per foot of depth as computed by the Mononobe-Okabe equation.</li> <li>• Basement/retaining walls which are restrained against movement or rotation at the top shall be designed for 32H of trapezoidal earth pressure distribution.</li> </ul>
<p>Hazards and Nuisances including Site Safety</p>	<p style="text-align: center;">4</p>	<p>During construction, there would be 24-hour security on site. On-site security measures have been incorporated into the design of the development. These would include a security gate providing access by intercom and a security alarm system for the building manager's office. At night, outdoor security lighting operated by light sensor would be provided.</p> <p>In regards to hazardous materials, a Phase I report was prepared by LFR Environmental Management and Consulting Engineering in December 2009 for the project site. This Phase 1 report updated the original report prepared in 2006 and two subsequent Phase 1 reports prepared in 2007 and 2008.</p> <p>According to the December 2009 Phase 1 on-site conditions have not changed since completion of the original Phase I and the subsequent reports. Additionally, the December 2009 Phase 1 concluded that there did not appear to be any impacts to the site from adjoining properties. Regulatory database lists were reviewed for cases pertaining to leaking USTs and ASTs, hazardous waste sites, and abandoned sites within the specified radii of standards established by ASTM. The information provided by EDR and the reported groundwater flow direction (toward the southwest) were used in this assessment. The current EDR report is similar to the 2008 EDR report; no off-site listings that would appear to present a potential environmental issue for the site were identified. No new listings were identified in the EDR report obtained in 2009 that would present a concern to the site.</p>



Land Development	Code	Source or Documentation
		Based on the Phase I ESA, LFR concluded that there are no environmental concerns associated with the site. Therefore, LFR recommended no further action or investigation regarding the site.
Energy Consumption	1	The proposed project would result in an increase in energy consumption due to the addition of 21 housing units. The project will incorporate energy conservation requirements pursuant to Title 24 of the California Building Code. These standards include policies affecting building envelope, building Heating Ventilation and Air Conditioning (HVAC) requirements, water heating requirements, lighting, and overall performance methods. The proposed project has been designed to exceed the energy efficiency requirements of Title 24 by approximately 10%. As such, the proposed project would be more energy efficient than other similar apartment developments in the region. In addition, the proposed project would likely obtain the U.S. Green Building Council's (USGBC) Leadership in Energy and Environmental Design (LEED) basic certification rating through adherence to various USGBC standards pertaining to energy efficiency and performance, among others. A LEED certification would ensure that the project exceeds the energy conservation standards pursuant to Title 24 of the California Building Code by at least 10%. Some of the measures that will also help reduce the development's energy footprint include using recycled construction materials such as carpet and bathroom tiles wherever possible. In addition, drought-tolerant landscaping elements shall be incorporated into the project design. As such, the proposed project is not anticipated to result in significantly adverse effects upon energy consumption.
Noise [Contribution to Community Noise Levels]	4	The proposed project would construct 21 low-income housing units for transitional age youth. This use is compatible with surrounding uses, which include primarily residential and some commercial uses to the north and south of the project site.  The project is not expected to have an adverse effect on ambient noise levels in the community, as it would be compatible with existing, surrounding uses. As stated in the "Transportation" section below, the proposed project is not expected to generate a substantial increase in vehicle trips in the project site vicinity. Therefore no increase in community ambient

Land Development	Code	Source or Documentation
		<p>noise would occur due to the building's operation or to an increase in existing traffic noise.</p> <p><b>Construction Noise</b></p> <p>Construction of the proposed project would generate noise that would be noticeable in the surrounding environment. Construction noise is regulated by the City's Municipal code.</p> <p>The evaluation of project construction noise impacts is based on typical noise level emissions during domestic housing construction, as developed for the U.S. EPA (EPA 1971). Project-related construction would result in short-term increases in noise levels. The nearest noise-sensitive receptors are the residents living in the Apartments at 806 and 817 Burlington Avenue and the single-family home located at 826 Burlington Avenue. The closest receptors after the above listed properties are located at the Burlington Convalescent Hospital approximately 150 feet to the southwest of the project site. Noise levels from construction at adjacent noise-sensitive land uses during the loudest phases of construction would be in excess of the City's 75 dBA standard for construction noise (LA Municipal Code).</p> <p>Construction noise is unavoidable and could adversely affect some nearby residents during construction activity periods. However, the noise would be temporary and limited to the duration of the construction in any one location. The following measures shall be incorporated into the project contract specifications to minimize construction noise effects.</p> <p><b>Mitigation Measures</b></p> <ul style="list-style-type: none"> <li>• All mobile or fixed noise-producing equipment used on the project that is regulated for noise output by a local, state, or federal agency shall comply with such regulation while in the course of project activity.</li> <li>• Electrically powered equipment instead of pneumatic or internal combustion powered equipment shall be used, where feasible.</li> <li>• Material stockpiles and mobile equipment staging, parking, and maintenance areas shall be located as far as practicable from noise-sensitive receptors.</li> </ul>

Land Development	Code	Source or Documentation
		<ul style="list-style-type: none"> <li>• Construction site and haul-road speed limits shall be established and enforced during the construction period.</li> <li>• The hours of construction, including noisy maintenance activities and all spoils and material transport, shall be restricted to the periods and days permitted by the local noise or other applicable ordinance. The only exception to this mitigation should be inaudible underground tunneling or similar construction activity. Noise-producing project activity shall comply with local noise control regulations affecting construction activity or obtain exemptions therefrom.</li> <li>• The use of noise-producing signals, including horns, whistles, alarms, and bells shall be for safety warning purposes only.</li> <li>• No project-related public address or music system shall be audible at any adjacent receptor.</li> <li>• The onsite construction supervisor shall have the responsibility and authority to receive and resolve noise complaints. A clear appeal process to the Owner shall be established prior to construction commencement that will allow for resolution of noise problems that cannot be immediately solved by the site supervisor.</li> <li>• Contract incentives may be offered to the construction contractor to minimize or eliminate noise complaints resulting from project activities where project construction would result in significant noise impacts.</li> </ul>
<p>Air Quality [Effects of Ambient Air Quality on Project and Contribution to Community Pollution Levels]</p>	<p>4</p>	<p><b>Effects of Ambient Air Quality on Project</b> The project site is in a non-attainment area for several criteria pollutants; however, the project will conform to the applicable air quality management plan. Accordingly, the project will not adversely affect air quality. For a discussion of the basis for this finding, refer to “Air Quality” in the Statutory Checklist, above, as well as the Air Quality Memo in Appendix F.</p> <p><b>Contribution to Community Pollution Levels</b> According to the Air Quality Memo prepared for this project (see Appendix F), criteria pollutant emissions during construction of the project and during operation would remain below the applicable significance thresholds and conform with the local Air</p>

Land Development	Code	Source or Documentation
		<p>Quality Management Plan.</p> <p>Although the proposed project would not generate substantial adverse effects pertaining to air quality during construction or operation, the following mitigation measures will help reduce any effects and ensure they are not adverse.</p> <p><b>Mitigation—Short-Term Construction Air Quality</b></p> <ol style="list-style-type: none"> <li>1. All unpaved demolition and construction areas shall be wetted at least twice daily during excavation and construction, and temporary dust covers shall be used to reduce dust emissions and meet SCAQMD District Rule 403. Wetting could reduce fugitive dust by as much as 50%.</li> <li>2. The owner or contractor shall keep the construction area sufficiently dampened to control dust caused by construction and hauling, and at all times provide reasonable control of dust caused by wind.</li> <li>3. All loads shall be secured by trimming, watering, or other appropriate means to prevent spillage and dust.</li> <li>4. All materials transported off site shall be either sufficiently watered or securely covered to prevent excessive amounts of dust.</li> <li>5. All clearing, earth moving, or excavation activities shall be discontinued during periods of high winds (i.e., greater than 15 mph), so as to prevent excessive amounts of dust.</li> <li>6. General contractors shall maintain and operate construction equipment so as to minimize exhaust emissions.</li> </ol> <p><b>Mitigation—Operation Air Quality</b></p> <ol style="list-style-type: none"> <li>1. An air filtration system shall be installed and maintained for the residences with filters meeting or exceeding the ASHRAE Standard 52.2 Minimum Efficiency Reporting Value (MERV) of 11, to the satisfaction of the Department of Building and Safety.</li> </ol>
<p>Environmental Design [Visual Quality—Coherence, Diversity, Compatible Use and Scale ]</p>	<p>1</p>	<p>The project site is a 0.34-acre site located on the 800 block of Burlington Avenue, between 8th Street and James M. Wood Boulevard. The site is currently vacant and undeveloped. The proposed residence would consist of a three story apartment complex oriented in a U-shape around an open air courtyard, above a single level subterranean parking garage. According to the Section 106 Review prepared by ICF Jones &amp; Stokes in August 2007, the proposed project</p>

Land Development	Code	Source or Documentation
		<p>would have a height and massing that is consistent with the character of the surrounding neighborhood and would not significantly affect the adjacent Beacon Avenue Historic District’s feeling, context, or setting. The proposed project will adhere to the provisions of the Planning and Zoning Ordinances of the City Municipal Code, as well as the design standards of the Community Plan for the neighborhood.</p>

Socioeconomic	Code	Source or Documentation
Demographic Character Changes	1	<p>The project is located in a low-income and minority community. The proposed project would provide affordable housing options in the community. The project is not expected to result in gentrification or increase in property values such that it would result in changes in the community’s demographic character.</p>
Displacement	1	<p>The project site is a vacant, undeveloped parcel which may have been previously used as a parking lot. As such there are no residents or businesses on the property which would be displaced as a result of the proposed project. The project proponent would acquire the subject property and develop a 21-unit apartment complex on the site. None of the adjacent residences would be physically affected by the proposed project’s construction and therefore, no residential displacements would occur. The proposed project would not involve or cause the construction of replacement housing elsewhere.</p>
Employment and Income Patterns	2	<p>The proposed housing development is expected to provide social support services to its transitional age youth tenants in the form of job training and money management. Tenants of the proposed Young Burlington Apartments would be very low-income and formerly homeless youths with incomes under 25% of the area median income. The support services being provided would improve the tenants’ employment outlook and aid them in garnering higher wages, a beneficial impact. While the provision of these support services would result in benefits that are nominal at the regional level, it would provide an important local element to the low-income and minority community where it is located.</p>



<b>Community Facilities and Services</b>	<b>Code</b>	<b>Source or Documentation</b>
Educational Facilities	4	<p>The nearest schools serving the project site include MacArthur Park Primary Center (K-1), Esperanza Elementary School (K-5), Tenth Street Elementary School (K-5), Camino Nuevo Charter Academy (K-8), John H. Liechty Middle School (6-8), Los Angeles Academy of Arts and Enterprise (6-9), , Belmont Senior High School (9-12), and Design High School (9-12).</p> <p>The proposed project would construct 21 new residential units for low-income, emancipated, and transitional age youth. The special circumstances of these tenants makes it unlikely that they will be attending public schools in the surrounding area, as most would be enrolled in vocational schools/GED programs, or job training through social service providers. However, it is likely that a small number of tenants would be enrolled in high schools such as Belmont Senior High School. The following mitigation measure will ensure that there are no adverse effects on existing educational facilities.</p> <p><b>Mitigation Measure</b></p> <ol style="list-style-type: none"> <li>1. The project proponent shall pay all required school fees to the Los Angeles Unified School District to offset the effect of additional student enrollment at schools serving the project area.</li> </ol>
Commercial Facilities	1	As stated earlier, the proposed project would include the development of 21 one-bedroom affordable housing units for low-income, emancipated, and transitional age youth. The proposed project is not expected to generate a substantial demand for commercial facilities.
Health Care	1	The proposed project is not anticipated to have an adverse effect on health care services for the neighborhood as it will only add 21 one bedroom units, which is not a substantial increase in population.
Social Services	1	The proposed residential development would be relatively small within the city-wide and regional context, and would not substantially contribute to the demand for social services. In addition to providing affordable housing, the proposed project would provide services such as life skill training, job training, money management, health education, and drug and alcohol addiction attenuation. By providing needed affordable housing in the low-income and minority community of Westlake, the project may contribute to reducing demand for affordable housing social services.

Community Facilities and Services	Code	Source or Documentation
Solid Waste	4	<p>Environmental effects on existing solid waste facilities may result from project implementation due to the generation of additional solid waste. Solid waste transport services within the City of Los Angeles are provided by City staff and by private contractors. The need for additional capacity for solid waste at landfills is always present, with such a large metropolis as Los Angeles. Any potential adverse effect shall be mitigated by the following measures.</p> <p><b>Mitigation Measures</b></p> <ol style="list-style-type: none"> <li>1. Recycling bins shall be provided at appropriate locations to promote recycling of paper, metal, glass, and other recyclable material. These bins shall be emptied and recycled accordingly as a part of the project's regular solid waste disposal program.</li> <li>2. Prior to the issuance of any demolition or construction permit, the applicant shall provide a copy of the receipt or contract from a waste disposal company providing services to the project, specifying recycled waste service(s), to the satisfaction of the Department of Building and Safety. The demolition and construction contractor(s) shall only contract for waste disposal services with a company that recycles demolition and/or construction-related wastes.</li> <li>3. To facilitate onsite separation and recycling of demolition and construction-related wastes, the contractor(s) shall provide temporary waste separation bins on site during demolition and construction. These bins shall be emptied and recycled accordingly as a part of the project's regular solid waste disposal program.</li> </ol>
Waste Water	1	<p>For its wastewater treatment needs, the City of Los Angeles utilizes the Hyperion Treatment Plant (HTP), the Tillman Water Reclamation Plant (TWRP), the Los Angeles Glendale Water Reclamation Plant (LAGWRP), and the Terminal Island Treatment Plant (TITP). Two contract agency plants also treat some City flows: the Burbank Water Reclamation Plant and the Los Angeles County Joint Water Pollution Control Plant (JWPCP). The Hyperion Treatment System, which consists of the HTP and the upstream TWRP and LAGWRP, provides the majority of Los Angeles' treatment needs. The City has planned increases in plant</p>

Community Facilities and Services	Code	Source or Documentation
		<p>capacities by the year 2010 for LAGWRP, from 20 million gallons per day (mgd) to 50 mgd; and HTP, from 420 mgd to 900 mgd. Though the former has received regulatory approval, it has not been funded by the 10-year Capital Improvements Program, and expansion at this location may or may not prove necessary by 2010. These findings were obtained from Chapter 9 of the Goals, Objectives, and Policies of the Framework Element of the City General Plan. The construction of this proposed project would result in the development of 21 one bedroom residential units with associated subterranean parking. Proposed development would not require the construction of new water or wastewater treatment facilities or the expansion of existing facilities. The proposed project would not exceed the wastewater treatment requirements of the Los Angeles Regional Water Quality Control Board.</p>
Stormwater	4	<p>Per City guidelines, the project would be required to control stormwater runoff using best management practices (BMPs) and a retention basin. After implementation of mitigation measures, the project would not result in an adverse effect on stormwater.</p> <p><b>Mitigation Measures</b></p> <ol style="list-style-type: none"> <li>1. Project applicants shall implement stormwater BMPs to treat and infiltrate the runoff from a storm event producing <math>\frac{3}{4}</math> inch of rainfall in a 24-hour period. The design of structural BMPs shall be in accordance with the <i>Development Best Management Practices Handbook, Part B Planning Activities</i>. A signed certificate from a California licensed civil engineer or licensed architect that the proposed BMPs meet this numerical threshold standard is required.</li> <li>2. Post-development peak stormwater runoff discharge rates shall not exceed the estimated pre-development rate for developments where the increased peak stormwater discharge rate will result in increased potential for downstream erosion.</li> <li>3. Trees and other vegetation shall be maximized at each site by planting additional vegetation, clustering tree areas, and promoting the use of</li> </ol>

Community Facilities and Services	Code	Source or Documentation
		<p>native and/or drought tolerant plants.</p> <ol style="list-style-type: none"> <li>4. Any connection to the sanitary sewer must have authorization from the Bureau of Sanitation.</li> <li>5. Impervious surface area shall be reduced by using permeable pavement materials where appropriate, including: pervious concrete/asphalt; unit pavers, i.e., turf block; and granular materials, i.e., crushed aggregates, cobbles.</li> <li>6. Roof runoff systems shall be installed where site is suitable for installation. Runoff from rooftops is relatively clean, and can provide groundwater recharge and reduce excess runoff into storm drains.</li> <li>7. Messages shall be painted adjacent to storm drain inlets prohibiting the dumping of improper materials into the storm drain system. Prefabricated stencils can be obtained from the Department of Public Works, Stormwater Management Division.</li> <li>8. All storm drain inlets and catch basins within the project area shall be stenciled with prohibitive language (such as NO DUMPING—DRAINS TO OCEAN) and/or graphical icons to discourage illegal dumping.</li> <li>9. Signs and prohibitive language and/or graphical icons, which prohibit illegal dumping, shall be posted at public access points along the channels and creeks within the project area.</li> <li>10. Legibility of stencils and signs shall be maintained.</li> <li>11. An efficient irrigation system shall be designed to minimize runoff including: drip irrigation for shrubs to limit excessive spray, shutoff devices to prevent irrigation after significant precipitation, and flow reducers.</li> <li>12. The owner(s) of the property shall prepare and execute a covenant and agreement (Planning Department General form CP-6770) satisfactory to the Planning Department binding the owners to post-construction maintenance on the structural BMPs in accordance with the Standard Urban Stormwater Mitigation Plan and or per manufacturer’s instructions.</li> </ol>
Water Supply	4	The proposed project would include the development of 21 residential units. Development of the proposed

Community Facilities and Services	Code	Source or Documentation
		<p>project would increase the demand of water at the site; however, the increased demand would be considered minimal. Additionally, the proposed project would incorporate various design measures for construction and operation of the project that would help reduce and avoid impacts on water supply. These measures would include low-flow toilets, shower heads, and faucets; drip-irrigation landscaping; and native or drought-tolerant landscaping where feasible. In addition, single-pass cooling equipment shall be strictly prohibited from use as per Article V of Chapter XII of the LAMC (City of Los Angeles Water Conservation Plan). Single-pass cooling refers to the use of potable water to extract heat from process equipment—e.g., vacuum pump, ice machines—by passing the water through equipment and discharging the heated water to the sanitary wastewater system.</p> <p>Unless otherwise required, all restroom faucets shall be of a self-closing design, to the satisfaction of the Department of Building and Safety.</p> <p>Implementation of mitigation measures described below would ensure that the increase of water usage would not result in a substantial adverse effect.</p> <p><b>Mitigation Measures</b></p> <ol style="list-style-type: none"> <li>1. The project shall comply with Ordinance No. 170,978 (Water Management), which imposes water conservation measures in landscape, installation, and maintenance (e.g., use drip irrigation and soak hoses in lieu of sprinklers to lower the amount of water lost to evaporation and overspray, set automatic sprinkler systems to irrigate during the early morning or evening hours to minimize water loss due to evaporation, and water less in the cooler months and during the rainy season).</li> <li>2. Unless otherwise required, and to the satisfaction of the Department of Building and Safety, the applicant shall install: <ul style="list-style-type: none"> <li>• High-efficiency toilets (maximum 1.28 gpf), including dual-flush water closets, and high-efficiency urinals (maximum 0.5 gpf), including no-flush or waterless urinals, in all restrooms as appropriate. Rebates may be offered through the Los Angeles Department of Water and Power to offset portions of the costs of these</li> </ul> </li> </ol>



Community Facilities and Services	Code	Source or Documentation
		<p>installations.</p> <ul style="list-style-type: none"> <li>• Restroom faucets with a maximum flow rate of 1.5 gallons per minute.</li> </ul> <p>3. In addition to the requirements of the Landscape Ordinance, the landscape plan shall incorporate the following:</p> <ol style="list-style-type: none"> <li>a. Weather-based irrigation controller with rain shutoff</li> <li>b. Matched precipitation (flow) rates for sprinkler heads</li> <li>c. Drip/microspray/subsurface irrigation where appropriate</li> <li>d. Minimum irrigation system distribution uniformity of 75 percent</li> <li>e. Proper hydro-zoning, turf minimization and use of native/drought tolerant plant materials</li> <li>f. Use of landscape contouring to minimize precipitation runoff</li> <li>g. A separate water meter (or submeter), flow sensor, and master valve shutoff shall be installed for irrigated landscape areas totaling 5,000 sf. and greater, to the satisfaction of the Department of Building and Safety</li> </ol>
Public Safety —Police	1	<p>The community is served by the Los Angeles Police Department Rampart Community Police Station located at 1401 West 6<sup>th</sup> Street.<sup>3</sup></p> <p>The proposed residential project would not result in an increase in police response times. In addition, on-site security measures have been incorporated into the design of the development. These include security systems, keyed entry gates and fencing. No adverse effect would result.</p>
—Fire	4	<p>The community is served by Los Angeles Fire Department Fire Station No. 11, located at 1819 West 7<sup>th</sup> Street, approximately 0.2 mile north of the site. Fire Station 11 serves the communities of Westlake and MacArthur Park.</p> <p>The proximity of the project to Fire Station No. 11 would result in quick emergency response times to the site. However, adverse effects may result from project implementation due to the location of the project in an</p>

<sup>3</sup> Los Angeles Police Department. n.d. *Rampart Community Police Station*. Available: <[http://www.lapdonline.org/rampart\\_community\\_police\\_station](http://www.lapdonline.org/rampart_community_police_station)>. Accessed: February 15, 2010.

Community Facilities and Services	Code	Source or Documentation
		<p>area with marginal fire protection facilities due to the large population size and density. This potential adverse effect will be mitigated by implementing the following measures.</p> <p><b>Mitigation Measures</b></p> <p>The following recommendations relative to fire safety shall be incorporated into the building plans:</p> <ol style="list-style-type: none"> <li>1. Submittal of a plot plan for approval by the Fire Department either prior to the recordation of a final map or the approval of a building permit.</li> <li>2. The plot plan shall include the following minimum design features: fire lanes, where required, shall be a minimum of 20 feet in width; all structures must be within 300 feet of an approved fire hydrant; and entrances to any dwelling unit or guest room shall not be more than 150 feet in distance in horizontal travel from the edge of the roadway of an improved street or approved fire lane.</li> </ol>

Community Facilities and Services	Code	Source or Documentation
—Emergency Medical	1	The proposed project's 21 residential units would result in a minimal increase in population and is not expected to increase emergency medical response times, and thus no adverse effect is expected. Both LADOT and LAFD will review the project's emergency access to ensure that the project meets fire code standards for emergency access.
Open Space and Recreation —Open Space	2	<p>The proposed project is not expected to have an adverse effect on open space in the community. The project site is currently vacant. The current site condition does not provide publically accessible open space nor does it contain an attractive and unique aesthetic landscape.</p> <p>The proposed project would result in landscape and design improvements to the currently vacant site. The proposed building would contain an open-air courtyard located on the first floor. A computer lab and two community /multi-purpose lounge rooms would also be developed under the proposed project. Each housing unit would include outdoor balcony/patio space.</p>
—Recreation	4	<p>Hope and Peace Pocket Park and MacArthur Park are the only public park facilities located within ½ mile of the proposed project site.</p> <p>The increased demand and use of parks, open space, and recreation facilities would be mitigated by the implementation of the following mitigation measure.</p> <p><b>Mitigation Measure</b></p> <ol style="list-style-type: none"> <li>Per Section 17.12-A of the LA Municipal Code, the owner/developer shall pay the applicable Quimby fees for the construction of condominiums, or Recreation and Park fees for construction of apartment buildings.</li> </ol>
—Cultural Facilities	4	<p>The increased demand and use of cultural facilities due to a small increase in population size would be mitigated by the implementation of the following mitigation measure.</p> <p><b>Mitigation Measure</b></p> <ol style="list-style-type: none"> <li>Per Section 17.12-A of the LA Municipal Code, the owner/developer shall pay the applicable Quimby fees for the construction of condominiums, or Recreation and Park fees for construction of apartment buildings.</li> </ol>

Community Facilities and Services	Code	Source or Documentation
Transportation	1	<p>The proposed residential project, which would contain 21 apartment units, would be constructed on a vacant and undeveloped site. The project would be similar to adjacent multi-family structures in the area and would not result in a substantial increase in traffic in relation to the existing traffic load and capacity of the street system.</p> <p><b>Transit:</b> The proposed project would not conflict with any alternative transportation policies. The Westlake community is well served by public transit services provided by Metro and the City of Los Angeles Department of Transportation (LADOT). Several Metro and LADOT bus routes have stops within walking distance of the project site. These routes include Metro lines 20/21, 66, 200, 366, 487/489, 603, 720. The LADOT DASH Pico Union/Echo Park bus operates along Westlake Avenue. The project is also located within 0.3 mile of Metro’s Westlake/MacArthur Park Red Line Subway Station. These bus stops and the Red Line station operation would not be affected by the proposed project, and, as a result, no impact on transit would result from implementation of the proposed project.</p> <p><b>Access:</b> Existing pedestrian and vehicular access to the project site is provided from Burlington Avenue and shall remain unaffected by the proposed project construction. Vehicular access to the proposed subterranean parking garage would be made available through the rear alley located just east of the project site. Therefore, no adverse effect on access to the site as a result of implementing the proposed project is expected.</p> <p><b>Parking:</b> According to Section 12.22 A.25(d)(2) of the Los Angeles Municipal Code (LAMC), the parking requirement for affordable housing units is one space for each dwelling unit, regardless of the number of habitable rooms. According to the LAMC, 21 residential parking spaces would be needed. The project would provide 22 residential parking spaces, therefore complying with this requirement of the LAMC.</p> <p>There are approximately 4 parking spaces adjacent to the project site along Burlington Avenue; however, no street parking would be affected by the proposed project construction.</p> <p><b>Air Traffic:</b> No change in air traffic patterns would result from the proposed mixed-use project.</p>

Natural Features	Code	Source or Documentation
Water Resources	4	<p>As discussed in “Stormwater,” above, discharge of stormwater runoff during construction will require the use of best management practices. After implementation of mitigation measures, the project will avoid having an adverse effect on stormwater. Stormwater mitigation measures are included in the “Stormwater” section.</p> <p>As discussed above in “Water Supply,” the Department of Water and Power has adequate water supplies to serve this residential project, and the project would incorporate water conservation measures. The net increase of water usage would not result in an adverse effect.</p> <p>For a discussion of surface water, see “Surface Water,” below.</p>
Surface Water	4	<p>The project site does not contain a stream or river. MacArthur Park Lake, a man-made lake feature of the namesake park, is located approximately 0.3 mile north of the project site but would not be affected by the proposed project. The site currently drains into a City storm drain, as would the proposed project. The proposed project would not cause the depletion of groundwater supplies or the interference of groundwater recharge. The project would be supplied with water by LADWP.</p> <p>The project will be required to control stormwater runoff using best management practices. After implementation of the following mitigation measures, no adverse effects on surface water would occur.</p> <p><b>Mitigation Measures</b></p> <ol style="list-style-type: none"> <li>1. Project applicants are required to implement stormwater BMPs to treat and infiltrate the runoff from a storm event producing ¾ inch of rainfall in a 24-hour period. The design of structural BMPs shall be in accordance with the <i>Development Best Management Practices Handbook, Part B Planning Activities</i>. A signed certificate from a California licensed civil engineer or licensed architect that the proposed BMPs meet this numerical threshold standard is required.</li> <li>2. Post-development peak stormwater runoff discharge rates shall not exceed the estimated pre-development rate for developments where the increased peak stormwater discharge rate will result in increased potential for downstream erosion.</li> </ol>



Natural Features	Code	Source or Documentation
		<ol style="list-style-type: none"> <li>3. Trees and other vegetation shall be maximized at each site by planting additional vegetation, clustering tree areas, and promoting the use of native and/or drought tolerant plants.</li> <li>4. Any connection to the sanitary sewer must have authorization from the Bureau of Sanitation.</li> <li>5. Impervious surface area shall be reduced by using permeable pavement materials where appropriate, including: pervious concrete/asphalt; unit pavers, i.e., turf block; and granular materials, i.e., crushed aggregates, cobbles.</li> <li>6. Roof runoff systems shall be installed where site is suitable for installation. Runoff from rooftops is relatively clean, and can provide groundwater recharge and reduce excess runoff into storm drains.</li> <li>7. Messages shall be painted adjacent to storm drain inlets that prohibit the dumping of improper materials into the storm drain system. Prefabricated stencils can be obtained from the Department of Public Works, Stormwater Management Division.</li> <li>8. All storm drain inlets and catch basins within the project area shall be stenciled with prohibitive language (such as NO DUMPING—DRAINS TO OCEAN) and/or graphical icons to discourage illegal dumping.</li> <li>9. Signs and prohibitive language and/or graphical icons, which prohibit illegal dumping, shall be posted at public access points along the channels and creeks within the project area.</li> <li>10. Legibility of stencils and signs shall be maintained.</li> <li>11. An efficient irrigation system shall be designed to minimize runoff, including the use of: drip irrigation for shrubs to limit excessive spray, shutoff devices to prevent irrigation after significant precipitation, and flow reducers.</li> <li>12. The owner(s) of the property shall prepare and execute a covenant and agreement (Planning Department General form CP-6770) satisfactory to the Planning Department binding the owners to post-construction maintenance on the structural BMPs in accordance with the Standard Urban Stormwater Mitigation Plan and or per manufacturer's instructions.</li> </ol>

<b>Natural Features</b>	<b>Code</b>	<b>Source or Documentation</b>
Unique Natural Features and Agricultural Lands	1	The project site is part of a fully urbanized area of the City of Los Angeles. The site is generally devoid any unique natural features or agricultural lands.
Vegetation and Wildlife	1	The proposed project site is part of a densely developed urban area of the City of Los Angeles. The site does not contain any unique vegetation or wildlife.

<b>Other Factors</b>	<b>Code</b>	<b>Source or Documentation</b>
Flood Disaster Protection Act [Flood Insurance] [§58.6(a)]	1	The proposed project is located outside of any flood zone as identified on the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM) Number 06037C1620F, effective September 26, 2008.
Coastal Barrier Resources Act/ Coastal Barrier Improvement Act [§58.6(c)]	1	The project does not involve activities on coastal barriers in the Coastal Barrier Resource System, as defined by The Coastal Barrier Resources Act of 1982 and the Coastal Barrier Improvement Act of 1990. These findings are based on a review of the U.S. Fish and Wildlife Service website ( <a href="http://www.fws.gov/habitatconservation/coastal_barrier.html">http://www.fws.gov/habitatconservation/coastal_barrier.html</a> ).
Airport Runway Clear Zone or Clear Zone Disclosure [§58.6(d)]	1	No airports are located in the vicinity of the project site. Therefore, no Clear Zones apply to the site.
Other Factors	2	The proposed project site is located within a fully developed urban area of Los Angeles. The proposed project would be consistent with the planning objectives for the site. The project is an infill development within the existing urban area located in close proximity to existing transit service and freeways; is served by existing infrastructure; would provide housing; and would contribute towards a much needed supply of high quality affordable housing options in the community.

## Summary of Findings and Conclusions

With the inclusion of specified mitigation measures, the project is anticipated to have no adverse effect on the environment. Table 1 (Summary of Findings) summarizes the findings for each environmental factor.

**Table 1: Summary of Findings**

Environmental Factor	Project Impact
<ul style="list-style-type: none"> <li>• Employment and Income Patterns</li> <li>• Open Space and Recreation—Open Space</li> <li>• Other Factors</li> </ul>	Potentially beneficial
<ul style="list-style-type: none"> <li>• Erosion</li> <li>• Soil Suitability</li> <li>• Hazards and Nuisances including Site Safety</li> <li>• Noise</li> <li>• Air Quality</li> <li>• Educational Facilities</li> <li>• Solid Waste</li> <li>• Stormwater</li> <li>• Water Supply</li> <li>• Public Safety—Fire</li> <li>• Open Space and Recreation—Recreation</li> <li>• Open Space and Recreation—Cultural Facilities</li> <li>• Water Resources</li> <li>• Surface Water</li> </ul>	Requires mitigation
<ul style="list-style-type: none"> <li>• Conformance with Comprehensive Plans and Zoning</li> <li>• Compatibility and Urban Impact</li> <li>• Slope</li> <li>• Energy Consumption</li> <li>• Environmental Design</li> <li>• Demographic Character Changes</li> <li>• Displacement</li> <li>• Commercial Facilities</li> <li>• Health Care</li> <li>• Social Services</li> <li>• Waste Water</li> </ul>	No impact

Environmental Factor	Project Impact
<ul style="list-style-type: none"> <li>• Public Safety---Police</li> <li>• Public Safety---Emergency Medical</li> <li>• Transportation</li> <li>• Unique Natural Features and Agricultural Lands</li> <li>• Vegetation and Wildlife</li> <li>• Flood Disaster Protection Act</li> <li>• Coastal Barrier Resources Act/Coastal Barrier Improvement Act</li> <li>• Airport Runway Clear Zone or Clear Zone Disclosure</li> </ul>	<p>No impact</p>

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## 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.)*

### No Action Alternative

*[24 CFR 58.40(e)] (Discuss the benefits and adverse impacts to the human environment of not implementing the preferred alternative).*

Absent the project, existing undeveloped conditions of the subject site would continue. The site would continue to be vacant and undeveloped. The community would not benefit from the project's provision of affordable housing or social services. The adverse employment, and income, as well as social service effects would continue. Benefits associated with modern buildings featuring landscaping and security enhancements would not occur. Absent the project, it is unknown when and if another proposal for the reuse of the site would be forthcoming.

### Four-Story Design Alternative

The number of housing units under this alternative would remain the same as the proposed project. Under this design alternative the proposed apartment complex would be designed as a 4-story building oriented in an L-shape around a central courtyard above a subterranean parking garage. The building would contain a singular open corridor connecting the various units on each floor. The open space courtyard would be of a larger area than what is currently proposed but would open to the rear alley, affording less privacy to tenants. The potential environmental effects associated with this alternative would be similar to those of the project. The current project design reflects design changes and modifications made by the project proponent in regard to concerns about the building mass compatibility with the surrounding neighborhood and the overall utility of the common/open space proposed. Therefore, this alternative was modified to become what is now the proposed project due to these site plan changes.

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## Mitigation Measures Recommended

[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.)

### I. Soil Suitability (Construction and Design)

The Project proponent shall implement the recommendations included in the Soil Investigation Report pertaining to the following issues (Provided in Appendix H):

#### Foundation

- a. Allowable bearing value (2,500 pounds per square foot)
- b. Lateral Design
- c. Foundation Settlement
- d. Footing Reinforcement (at least four No.4 bars or as deemed necessary by Structural Engineer)

#### Slabs on Grade

- a. Concrete slabs (minimum thickness of 4 inches and cast over undisturbed soils)
- b. Slab reinforcement (at least No. 4 bars spaced 16 inches on centers)
- c. Moisture barrier (plastic membrane of 6 millimeters beneath slabs-on-grade)

#### Basement/Retaining Wall

- a. Wall footings shall have same allowable bearing value as given for foundation
- b. Active earth pressures (retaining walls shall be designed to resist the lateral earth pressure of retained soils plus surcharge loads from adjacent structures).
- c. Wall drainage (Retaining walls shall be provided with perforated pipe and gravel subdrain)
- d. Wall backfill (temporary cut bank shall be cleared of loose materials and debris, proper compaction of backfill, backfill shall be placed in horizontal lifts not more than 8 inches in thickness). Pea gravel backfill shall be used where space limitations do not allow for conventional backfill (lifts of no more than 2 feet in thickness)
- e. Waterproofing of basement retaining walls

#### Temporary Excavation

- b. Temporary cuts to a depth ranging from 8 to 13 feet. Temporary cut with vehicular traffic load from alley shall be shored. No excavation during unfavorable weather. Plastic sheets shall be used to cover excavated banks when threatened by rain.

#### Shoring

- a. Soldier piles should have a minimum diameter of 12 inches
- b. Passive pressure given for lateral design shall be doubled if pile spacing on centers are greater than 3 times the pile diameter
- c. Shoring shall be designed so that the deflection does not exceed ¼ inch at the top of shoring. If greater deflection occurs during construction, additional bracing shall be provided.
- d. Monitoring of movements in the shoring system shall begin prior to the beginning of excavation and shall continue through backfilling activities.

**Corrosivity**

- a. Underground steel piping shall be blasted and given a high quality protective coating. Buried steel piping shall be electrically insulated from dissimilar metals

**Post-Grading**

- a. Site Drainage
  - Positive drainage devices such as sloping sidewalks, graded swales, and/or area drains shall be provided;
  - Where slabs or pavement slabs or pavement are feasible, ground surface shall be provided with a minimum gradient of 1% away from structure;
  - Water shall be transported off site in approved drainage devices or unobstructed swales.
  - Planting areas at grade should have positive drainage, exposed soil areas shall be above adjacent paved grades, planters shall not be depressed below adjacent paved grades unless provisions are made for drainage, and adequate drainage gradient shall be provided where planting areas are adjacent to pavement
  - Irrigation methods shall promote uniformity of moisture in planters and beneath adjacent flat-work. Over-and under-watering shall be avoided
  - All roof and wall surface drainage shall be collected and conducted by a non-erosive device to streets or other designated drainage areas.
- b. Trench backfill
  - Utility trench and/or structural backfill shall be placed by mechanical compaction to a minimum of 90 percent of laboratory maximum density
  - Where utility contractors indicate compaction equipment is undesirable, lightweight mechanical equipment and/or bedding of buried conduits shall be used or other method of trench compaction deemed appropriate by geotechnical consultant at the time of construction.
  - Where utility trenches are proposed parallel to building footings, the bottom of the trench shall not extend below 1 horizontal to 1 vertical plane project downward from the outside bottom edge of the adjacent footing.
- c. Geotechnical Inspection
  - A geotechnical consultant shall inspect all temporary cuts, shoring, and foundation excavations.
  - A geotechnical consultant shall inspect the finish grading, utility or other trench backfill, retaining wall backfill, or other earthwork completed for the proposed project.

In addition to the above mentioned mitigation measures, an Addendum to the Soils Investigation Report was prepared April 15, 2008 by Pacific Geotech Inc. The Addendum made the following additional recommendations to further prevent adverse conditions resulting from construction of the proposed project:

**Retaining Wall Design**

- Retaining walls shall be designed to resist the lateral earth pressure exerted by retained soils and seismic lateral earth pressure plus any surcharge loads from adjacent structures or vehicular traffic within a distance equal to the depth of the retaining wall
- Retaining walls that are free to rotate at the top shall be designed for an equivalent fluid pressure of 50 pounds per square foot per foot of depth as computed by the Mononobe-Okabe equation.
- Basement/retaining walls which are restrained against movement or rotation at the top shall be designed for 32H of trapezoidal earth pressure distribution.

## II. Noise (Construction Period)

- All mobile or fixed noise-producing equipment used on the project that is regulated for noise output by a local, state, or federal agency shall comply with such regulation while in the course of project activity.
- Electrically powered equipment instead of pneumatic or internal combustion powered equipment shall be used, where feasible.
- Material stockpiles and mobile equipment staging, parking, and maintenance areas shall be located as far as practicable from noise-sensitive receptors.
- Construction site and haul-road speed limits shall be established and enforced during the construction period.
- The hours of construction, including noisy maintenance activities and all spoils and material transport, shall be restricted to the periods and days permitted by the local noise or other applicable ordinance. The only exception to this mitigation should be inaudible underground tunneling or similar construction activity. Noise-producing project activity shall comply with local noise control regulations affecting construction activity or obtain exemptions therefrom.
- The use of noise-producing signals, including horns, whistles, alarms, and bells shall be for safety warning purposes only.
- No project-related public address or music system shall be audible at any adjacent receptor.
- The onsite construction supervisor shall have the responsibility and authority to receive and resolve noise complaints. A clear appeal process to the Owner shall be established prior to construction commencement that will allow for resolution of noise problems that cannot be immediately solved by the site supervisor.
- Contract incentives may be offered to the construction contractor to minimize or eliminate noise complaints resulting from project activities where project construction would result in significant noise impacts.

## III. Air Quality (Construction Period)

- All unpaved demolition and construction areas shall be wetted at least twice daily during excavation and construction, and temporary dust covers shall be used to reduce dust emissions and meet SCAQMD District Rule 403. Wetting could reduce fugitive dust by as much as 50 percent.
- The owner or contractor shall keep the construction area sufficiently dampened to control dust caused by construction and hauling, and at all times provide reasonable control of dust caused by wind.
- All loads shall be secured by trimming, watering, or other appropriate means to prevent spillage and dust.
- All materials transported off site shall be either sufficiently watered or securely covered to prevent excessive amount of dust.
- All clearing, earth moving, or excavation activities shall be discontinued during periods of high wind (i.e., greater than 15 mph), so as to prevent excessive amounts of dust.
- General contractors shall maintain and operate construction equipment so as to minimize exhaust emissions.



#### **IV. Air Pollution (Stationary)**

- An air filtration system shall be installed and maintained for the residences with filters meeting or exceeding the ASHRAE Standard 52.2 Minimum Efficiency Reporting Value (MERV) of 11, to the satisfaction of the Department of Building and Safety.

#### **V. Fire Services**

The following recommendations of the Fire Department relative to fire safety shall be incorporated into the building plans:

- A plot plan shall be submitted for approval by the Fire Department either prior to the recordation of a final map or the approval of a building permit.
- The plot plan shall include the following minimum design features:
  - fire lanes, where required, shall be a minimum of 20 feet in width;
  - all structures must be within 300 feet of an approved fire hydrant; and
  - entrances to any dwelling unit or guest room shall not be more than 150 feet in distance in horizontal travel from the edge of the roadway of an improved street or approved fire lane.

#### **VI. Recreation (Increase Demand for Parks, Recreational Facilities, or Cultural Facilities)**

- Per Section 17.12-A of the LA Municipal Code, the applicant shall pay the applicable Quimby fees for the construction of condominiums, or Recreation and Park fees for construction of apartment buildings.

#### **VII. School Services**

- The applicant shall pay school fees to the Los Angeles Unified School District to offset the impact of additional student enrollment at schools serving the project area.

#### **VIII. Stormwater Runoff Management / Surface Water**

Ordinance Nos. 172,176 and 173,494 specify Stormwater and Urban Runoff Pollution Control, which requires the application of Best Management Practices (BMPs). Chapter IX, Division 70 of the Los Angeles Municipal Code addresses grading, excavations, and fills. Applicants shall meet the requirements of the Standard Urban Stormwater Mitigation Plan (SUSMP) approved by Los Angeles Regional Water Quality Control Board, including the following (a copy of the SUSMP can be downloaded at <http://www.swrcb.ca.gov/rwqcb4/>):

- Project applicant shall implement stormwater BMPs to treat and infiltrate the runoff from a storm event producing  $\frac{3}{4}$  inch of rainfall in a 24-hour period. The design of structural BMPs shall be in accordance with the *Development Best Management Practices Handbook*, Part B Planning Activities. A signed certificate from a California licensed civil engineer or licensed architect that the proposed BMPs meet this numerical threshold standard is required.
- Post development peak stormwater runoff discharge rates shall not exceed the estimated pre-development rate for developments where the increased peak stormwater discharge rate will result in increased potential for downstream erosion.

- Trees and other vegetation shall be maximized at each site by planting additional vegetation, clustering tree areas, and promoting the use of native and/or drought tolerant plants.
- Any connection to the sanitary sewer must have authorization from the Bureau of Sanitation.
- Impervious surface area shall be reduced by using permeable pavement materials where appropriate, including: pervious concrete/asphalt; unit pavers, i.e., turf block; and granular materials, i.e., crushed aggregates, cobbles.
- Roof runoff systems shall be installed where site is suitable for installation. Runoff from rooftops is relatively clean, can provide groundwater recharge, and reduce excess runoff into storm drains.
- Messages shall be painted adjacent to storm drain inlets that prohibit the dumping of improper materials into the storm drain system. Prefabricated stencils can be obtained from the Department of Public Works, Stormwater Management Division.
- All storm drain inlets and catch basins within the project area shall be stenciled with prohibitive language (such as NO DUMPING—DRAINS TO OCEAN) and/or graphical icons to discourage illegal dumping.
- Signs and prohibitive language and/or graphical icons, which prohibit illegal dumping, shall be posted at public access points along channels and creeks within the project area.
- Legibility of stencils and signs shall be maintained.
- An efficient irrigation system shall be designed to minimize runoff including: drip irrigation for shrubs to limit excessive spray, shutoff devices to prevent irrigation after significant precipitation, and flow reducers.
- The owner(s) of the property shall prepare and execute a covenant and agreement (Planning Department General form CP-6770) satisfactory to the Planning Department binding the owners to post-construction maintenance on the structural BMPs in accordance with the Standard Urban Stormwater Mitigation Plan and/or per manufacturer's instructions.

## **IX. Utilities (Local or Regional Water Supplies)**

- The project shall comply with Ordinance No. 170,978 (Water Management), which imposes water conservation measures in landscape, installation, and maintenance (e.g., use drip irrigation and soak hoses in lieu of sprinklers to lower the amount of water lost to evaporation and overspray, set automatic sprinkler systems to irrigate during the early morning or evening hours to minimize water loss due to evaporation, and water less in the cooler months and during the rainy season).
- **All New Construction, Commercial/Industrial Remodel, Condominium Conversions, and Adaptive Reuse**  
Unless otherwise required, and to the satisfaction of the Department of Building and Safety, the applicant shall install:
  - a. High-efficiency toilets (maximum 1.28 gpf), including dual-flush water closets, and high-efficiency urinals (maximum 0.5 gpf), including no-flush or waterless urinals, in all restrooms as appropriate. Rebates may be offered through the Los Angeles Department of Water and Power to offset portions of the costs of these installations.
  - b. Restroom faucets with a maximum flow rate of 1.5 gallons per minute.

Single-pass cooling equipment shall be strictly prohibited from use. Prohibition of such equipment shall be indicated on the building plans and incorporated into tenant lease agreements. (Single-pass cooling refers to the use of potable water to extract heat from process equipment—e.g., vacuum pump, ice machines—by passing the water through equipment and discharging the heated water to the sanitary wastewater system.)

- **All New Commercial and Industrial**

Unless otherwise required, all restroom faucets shall be of a self-closing design, to the satisfaction of the Department of Building and Safety.

- **Landscaping**

In addition to the requirements of the Landscape Ordinance, the landscape plan shall incorporate the following:

- a. Weather-based irrigation controller with rain shutoff
- b. Matched precipitation (flow) rates for sprinkler heads
- c. Drip/microspray/subsurface irrigation where appropriate
- d. Minimum irrigation system distribution uniformity of 75 percent
- e. Proper hydro-zoning, turf minimization and use of native/drought tolerant plant materials
- f. Use of landscape contouring to minimize precipitation runoff
- g. A separate water meter (or submeter), flow sensor, and master valve shutoff shall be installed for irrigated landscape areas totaling 5,000 sf. and greater, to the satisfaction of the Department of Building and Safety

## Additional Studies Performed

- CEQA Notice of Exemption for Environmental Case ENV-2007-1279-CE. Prepared by City of Los Angeles, Department of City Planning. March 2007. Appendix A
- Phase I Environmental Site Assessment Update Report for the 0.34-acre Vacant Lot at 820 South Burlington Avenue. Prepared for Women Organizing Resources Knowledge Services, Inc., Los Angeles, California. December, 2009. Prepared by LFR, Inc. Provided in Appendix B
- Section 106 Review for 820 Burlington Avenue, Los Angeles, CA. ICF Jones & Stokes Associates. Prepared by Christopher J. Hetzel. August 2007. Provided in Appendix C.
- Air Quality Memorandum with Emissions Calculations and Analysis for URBEMIS Model. ICF Jones & Stokes. Prepared by Victor Ortiz. November 2009. Provided in Appendix F.
- Noise Study for 820 S. Burlington Avenue, Worksheets A and C of the HUD Noise Guidebook. Prepared by City of Los Angeles, Housing Department, August 2007. Provided in Appendix G.
- Soil Investigation Report for Proposed Apartment, 820 S. Burlington Avenue, Los Angeles California, ADDENDUM. Prepared for Women Organizing Resources Knowledge Services, Inc., Los Angeles, California. April 2008. Prepared by Pacific Geotech, Inc. Provided in Appendix H.

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[40 CFR 1508.9(b)]

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LFR, Inc. 2009. *Phase I Environmental Site Assessment Update Report for the 0.34-acre Vacant Lot at 820 South Burlington Avenue in Los Angeles, Los Angeles County, California 90057*. Prepared for Women Organizing Resources Knowledge Services. Los Angeles, CA.

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RECORD OF ENVIRONMENTAL CONSIDERATION REPORT(REC)

Project ID: PA-07-MO-4012-PW-00140

Title: DAS-004-Bridge on CR-19

NEPA DETERMINATION

Non Compliant Flag: No  
 EA Draft Date: EA Final Date:  
 EA Public Notice Date: EA Fonsi Date: Level: CATEX  
 EIS Notice of Intent Date: EIS ROD Date:

**Comments:** Cat C - Andrew County, 411 Court Street, Savannah, MO 64485 (Bridge on CR-19) (40.07081, - 94.94614). Applicant intends to replace the 4 span CR-19 bridge (#19000.5) constructed of 5 main 15 deep x 6 wide I-beams and 4 intermittent 6 deep x 3 wide I-beams. The foundation of the structure is comprised of 2 12 diameter wooden piles and a 22 12 deep x 4 wide I-beam cross member to pre-disaster condition in addition to meeting the States Local Policy Agency Manual for bridge replacement and rehabilitation. The new structure will need to be approximately 150 feet long and 26.67 feet wide. The exact length will be determined once the design and hydraulic analysis are performed. Applicant will remove all the bridge material and stock pile it at their maintenance facility.

This project has been determined to be Categorically Excluded from the need to prepare either an Environmental Impact Statement or Environmental Assessment in accordance with 44 CFR Part 10.8(d)(2)(xv). Particular attention should be given to the project conditions before and during project implementation. Failure to comply with these conditions may jeopardize federal assistance including funding. - tdean12 - 12/08/2011 16:11:20 GMT

CATEX CATEGORIES

Catex Category Code	Description	Selected
xv	(xv) Repair, reconstruction, restoration, elevation, retrofitting, upgrading to current codes and standards, or replacement of any facility in a manner that substantially conforms to the preexisting design, function, and location;	Yes

EXTRAORDINARY CIRCUMSTANCES

Extraordinary Circumstance Code	Description	Selected ?
	No Extraordinary Circumstances were selected	

ENVIRONMENTAL LAW / EXECUTIVE ORDER

Environmental Law/ Executive Order	Status	Description	Comments
Clean Air Act (CAA)	Completed	Project will not result in permanent air emissions - Review concluded	
Coastal Barrier Resources Act (CBRA)	Not Applicable	Project is not on or connected to CBRA Unit or otherwise protected area - Review concluded	
Clean Water Act (CWA)	Completed	Project would affect waters, including wetlands, of the U.S.	Information on this project is being forwarded to the Regional Office of the U.S. Army Corps of Engineers. They will advise the Applicant regarding need for Individual Permits or qualification of work under Nationwide and General Permits. See the

## RECORD OF ENVIRONMENTAL CONSIDERATION REPORT(REC)

Project ID: PA-07-MO-4012-PW-00140

Title: DAS-004-Bridge on CR-19

Environmental Law/ Executive Order	Status	Description	Comments
	Completed	Project may require Section 404/401 or Section 9/10 (Rivers and Harbors Act) permit, including qualification under Nationwide Permits - Review concluded	Attached Multiple Project Information Sheet (MPIS). - tdean12 - 12/08/2011 16:07:31 GMT
Coastal Zone Management Act (CZMA)	Not Applicable	Project is not located in a coastal zone area and does not affect a coastal zone area - Review concluded	
Executive Order 11988 - Floodplains	Completed	Located in floodplain or effects on floodplain/flood levels	The project is located within an A zone, area of 100-yr flooding, per Flood Insurance Rate Map (FIRM) 29003C0175C. The initial public notice was published on Aug 1, 2011 in the Missouri Register. The proposed action is not likely to result in any potential direct impacts that will adversely affect the natural values and function of floodplains, nor is it likely to increase the risk of flood loss. 8-step checklist attached. - tdean12 - 12/08/2011 15:51:11 GMT
	Completed	No adverse effect on floodplain and not adversely affected by the floodplain - Review concluded	
Executive Order 11990 - Wetlands	Completed	No effects on wetlands and project outside wetlands - Review concluded	A review of the National Wetland Inventory (NWI) online mapper, accessed on 12/8/2011, for the site indicates that the area is not located within a designated wetland. - tdean12 - 12/08/2011 15:52:58 GMT
Executive Order 12898 - Environmental Justice for Low Income and Minority Populations	Completed	No Low income or minority population in, near or affected by the project - Review concluded	
Endangered Species Act (ESA)	Completed	Listed species and/or designated critical habitat present in areas affected directly or indirectly by the federal action	The Missouri Department of Conservation Natural Heritage web-based database has been consulted. A Level 1 Report has been obtained for this project, indicating there are no protected species located in the project vicinity. - tdean12 - 12/08/2011 15:43:57 GMT
	Completed	No effect to species or designated critical habitat (See comments for justification) - Review concluded	
Farmland Protection Policy Act (FPPA)	Completed	Project does not affect designated prime or unique farmland - Review concluded	

RECORD OF ENVIRONMENTAL CONSIDERATION REPORT(REC)

Project ID: PA-07-MO-4012-PW-00140

Title: DAS-004-Bridge on CR-19

Environmental Law/ Executive Order	Status	Description	Comments
Fish and Wildlife Coordination Act (FWCA)	Completed	Project does not affect, control, or modify a waterway/body of water - Review concluded	
Migratory Bird Treaty Act (MBTA)	Completed	Project located within a flyway zone	
	Completed	Project does not have potential to take migratory birds - Review concluded	
Magnuson-Stevens Fishery Conservation and Management Act (MSA)	Completed	Project not located in or near Essential Fish Habitat - Review concluded	
National Historic Preservation Act (NHPA)	Completed	Not type of activity with potential to affect historic properties - Review concluded	The structure does not meet the 50-year-criterion, (c.1975) nor does it possess the level of exceptional importance required by criteria consideration G of the National Register guidelines to be considered eligible for the National Register of Historic Places. Therefore, the proposed work will have no effect on historic properties. - tdean12 - 12/08/2011 15:43:23 GMT
Wild and Scenic Rivers Act (WSR)	Completed	Project is not along and does not affect Wild and Scenic River - Review concluded	

**CONDITIONS**

**Special Conditions required on implementation of Projects:**

Project may require Section 401/404 Clean Water Act (CWA) permits and/or Section 10 permits under the Rivers & Harbors Act. When these permits are required, applicant must maintain documentation of compliance with applicable nationwide permit (NWP), exemption from requirements, or obtain individual permits from U.S. Army Corps of Engineers prior to construction, unless exempt by the NWP from pre-construction notification. Applicant must comply with all applicable permit conditions.

Source of condition: Clean Water Act (CWA)

Monitoring Required: No

**Standard Conditions:**

Any change to the approved scope of work will require re-evaluation for compliance with NEPA and other Laws and Executive Orders.

This review does not address all federal, state and local requirements. Acceptance of federal funding requires recipient to comply with all federal, state and local laws. Failure to obtain all appropriate federal, state and local environmental permits and clearances may jeopardize federal funding.

If ground disturbing activities occur during construction, applicant will monitor ground disturbance and if any potential archeological resources are discovered, will immediately cease construction in that area and notify the State and FEMA.



**8- STEP CHECKLIST - EO 11988 and EO 11990  
 FLOODPLAIN MANAGEMENT – CHECKLIST (44 CFR Part 9)**

<b>Project Amount</b>		
≤\$5,000	No 8-Step Required	
\$5,000-\$25,000	Steps 1, 4, 5, 8	Abbreviated process (only steps 1, 4, 5, 8) unless it is in floodway or coastal high hazard area, it is not repair (it is actually new construction or 'substantial improvement') or it is a structure or facility that has sustained repetitive damage from flooding from a disaster.
\$25,000-\$100,000	Steps 1, 2, 4, 5, 8	Abbreviated process (only steps 1, 2, 4, 5, and 8) unless it is in a floodway or coastal high hazard area, it is not repair (it is actually new construction or substantial improvement) or it is a structure or facility that has sustained repetitive damage from flooding from a disaster.
≥\$100,000	Full 8-Step	

**PROJECT TITLE:** Andrew County Bridge on CR-19

**PROPOSED ACTION:** Replace damaged bridge and bring up to codes and standards

**Actions which have the potential to be located in a Floodway or Coastal High Hazard Area.**

- YES**  **NO** Does the project include encroachments, including fill, new construction substantial improvements of structures or facilities, or other development within a designated regulatory floodway?
- YES**  **NO** The proposed action is located in a V-Zone as identified on the current effective Flood Insurance Rate Map (FIRM) or more recent best available data such as Advisory Base Flood Elevations (ABFE) or preliminary DFIRM.
- YES**  **NO** Is the project functionally dependent upon being near the water?
- YES**  **NO** Does the project facilitate open space use?

**STEP NO. 1 Determine whether the proposed action is located in a wetland and/or the 100-year floodplain (500-year floodplain for critical actions); and whether it has the potential to affect or be affected by a floodplain or wetland (see Sec. 9.7);**

**.Flood Hazard data available (check the box that applies)**

- YES**  **NO** The project is located in a 100 year floodplain as mapped by FIRM Panel No: 29003C0175C, Dated: .
- YES**  **NO** The project is located in a 500 year floodplain as mapped by FIRM Panel No. , Dated .
- YES**  **NO** The project is located in a floodplain as mapped by a FEMA draft/preliminary study. Name Dated .
- YES**  **NO** The project is located in a floodplain as mapped by the local community. Name Dated .

YES  NO The project is located in a floodplain as mapped by another Agency  
(State, Corps, USGS, NRCS, and etc.) Agency, Name Dated

**Flood Hazard data not available**

YES  NO The proposed action is subject to flooding based on evaluation from soil surveys, aerial photos, site visits and other available data.

Evaluation material used in determination:

YES  NO FEMA assumes the proposed action is subject to flooding based upon on previous flooding of the facility/structure.

**IF ANY OF THE ABOVE ANSWERS ARE YES, CONTINUE WITH THE FOLLOWING STEPS, OTHERWISE REVIEW IS COMPLETE.**

**STEP NO. 2 Notify the public at the earliest possible time of the intent to carry out an action in a floodplain or wetland, and involve the affected and interested public in the decision-making process (see Sec. 9.8);**

- Notice was provided as part of a disaster cumulative notice.
- Project Specific Notice was provided by: FEMA

Type of Public Notice:

- Newspaper, (name: )
- Post Site, (location: )
- Broadcast, (station: )
- Direct Mailing, (area: )
- Public Meeting, (dates: )
- Other:

**Date of Public Notice:** August 1, 2011

**STEP NO. 3 Identify and evaluate practicable alternatives to locating the proposed action in a floodplain or wetland (including alternative sites, actions and the "no action" option) (see Sec. 9.9). If a practicable alternative exists outside the floodplain or wetland FEMA must locate the action at the alternative site.**

**Alternative Options**

YES  NO Is there a practicable alternative site location outside of the 100-year floodplain?

Site location: facility must be at present location in order to serve its designed purpose, functionally dependant on location

YES  NO For Critical Actions, is there a practicable alternative site location outside of the 500-year floodplain?

Site location:

YES  NO Is there a practicable alternative action outside of the 100-year floodplain that will not affect the floodplain?

Alternative action:

YES  NO Is the NO Action alternative the most practicable alternative?

**IF ANY ABOVE ANSWER IS YES, THEN FEMA SHALL TAKE THAT ACTION AND THE REVIEW IS CONCLUDED. EXPLAIN WHY EACH ALTERNATIVE WAS NOT CHOSEN.**

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**STEP NO. 4 Identify the potential direct and indirect impacts associated with the occupancy or modification of floodplains and wetlands and the potential direct and indirect support of floodplain and wetland development that could result from the proposed action (see Sec. 9.10);**

YES  NO Is the Proposed Action based on incomplete information?

YES  NO Is the proposed action in compliance with the NFIP?

YES  NO Does the proposed action increase the risk of flood loss?

YES  NO Will the proposed action result in an increased base discharge or increase the flood hazard potential to other properties or structures?

YES  NO Does the proposed action minimize the impact of floods on human health, safety and welfare?

YES  NO Will the proposed action induce future growth and development, which will potentially adversely affect the floodplain?

YES  NO Does the proposed action involve dredging and/or filling of a floodplain?

YES  NO Will the proposed action result in the discharge of pollutants into the floodplain?

YES  NO Does the proposed action avoid long and short-term adverse impacts associated with the occupancy and modification of floodplains?

YES  NO Will the proposed action result in any indirect impacts that will affect the natural values and functions of floodplains?

YES  NO Will the proposed action forego an opportunity to restore the natural and beneficial values served by floodplains?

YES  NO Does the proposed action restore and/or preserve the natural and beneficial values served by floodplains?

YES  NO Will the proposed action result in an increase to the useful life of a structure or facility?

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**STEP NO. 5 Minimize the potential adverse impacts and support to or within floodplains and wetlands to be identified under Step 4, restore and preserve the natural and beneficial values served by floodplains, and preserve and enhance the natural and beneficial values served by wetlands (see Sec. 9.11);**



YES  NO Were flood hazard reduction techniques (see technical bulletins) applied to the proposed action to minimize the flood impacts if site location is in the 100-year floodplain?

If No, Identify flood hazard reduction techniques required as a condition of the grant:

YES  NO Were avoidance and minimization measures applied to the proposed action to minimize the short and long term impacts on the 100-year floodplain?

If no, identify measures required as a condition of the grant:

YES  NO Were measures implemented to restore and preserve the natural and beneficial values of the floodplain.

If no, identify measures required as a condition of the grant:

**IF ANY ABOVE ANSWER IS NO, EXPLAIN WHY:**

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**STEP NO. 6** Reevaluate the proposed action to determine first, if it is still practicable in light of its exposure to flood hazards, the extent to which it will aggravate the hazards to others, and its potential to disrupt floodplain and wetland values and second, if alternatives preliminarily rejected at step 3 are practicable in light of the information gained in Steps 4 and 5. FEMA shall not act in a floodplain or wetland unless it is the only practicable location (see Sec. 9.9);

YES  NO The action is still practicable at a floodplain site in light of the exposure to flood risk and ensuing disruption of natural values;

YES  NO The floodplain site is the only practicable alternative.

YES  NO There is no potential for limiting the action to increase the practicability of previously rejected non-floodplain sites and alternative actions.

YES  NO Minimization of harm to or within the floodplain can be achieved using all practicable means.

YES  NO The action in a floodplain clearly outweighs the requirement of E.O. 11988.

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**STEP NO. 7** Prepare and provide the public with a finding and public explanation of any final decision that the floodplain or wetland is the only practicable alternative (see Sec. 9.12);

Final Notice was provided as part of the floodplain notice. See EO 11988 checklist.

Notice was provided as part of a disaster cumulative notice.

Project Specific Notice was provided by: FEMA

Type of Public Notice:

Newspaper, (name: )

Post Site, (location: )

Broadcast, (station: )

- Direct Mailing, (area:        ) )
- Public Meeting, (dates:        ) )
- Other:

**Date of Public Notice:**

**AFTER PROVIDING THE FINAL NOTICE, FEMA SHALL, WITHOUT GOOD CAUSE SHOWN, WAIT AT LEAST 15 DAYS BEFORE CARRYING OUT THE PROPOSED ACTION.**

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**STEP NO. 8   Review the implementation and post-implementation phases of the proposed action to ensure that the requirements stated in Sec. 9.11 are fully implemented. Oversight responsibility shall be integrated into existing processes.**

YES  NO

Was Grant conditioned on review of implementation and post-implementation phases to insure compliance of EO 11988?



RECORD OF ENVIRONMENTAL CONSIDERATION REPORT(REC)

Project ID: PA-07-MO-1980-PW-01573

Title: SMH-007 - Demolition Debris Removal - 403 Emergency PHS

NEPA DETERMINATION

Non Compliant Flag: No  
 EA Draft Date: EA Final Date:  
 EA Public Notice Date: EA Fonsi Date: Level: CATEX  
 EIS Notice of Intent Date: EIS ROD Date:

Comments: Cat A - City of Berkeley, 6140 N. Hanley Road, Berkeley, MO 63134 (38.74873, -90.33493). Applicant will utilize Contract Labor and Equipment to demolish, remove or backfill the damaged home located at 6022 Jefferson Avenue, Berkeley, Missouri 63134 (38.74616, -90.32883).

This project has been determined to be Categoricaly Excluded from the need to prepare either an Environmental Impact Statement or Environmental Assessment in accordance with 44 CFR Part 10.8(d)(2)(xii). Particular attention should be given to the project conditions before and during project implementation. Failure to comply with these conditions may jeopardize federal assistance including funding.

- tdean12 - 10/27/2011 15:05:20 GMT

CATEX CATEGORIES

Catex Category Code	Description	Selected
xii	(xii) Demolition of structures and other improvements or disposal of uncontaminated structures and other improvements to permitted off-site locations, or both;	Yes

EXTRAORDINARY CIRCUMSTANCES

Extraordinary Circumstance Code	Description	Selected ?
	No Extraordinary Circumstances were selected	

ENVIRONMENTAL LAW / EXECUTIVE ORDER

Environmental Law/ Executive Order	Status	Description	Comments
Clean Air Act (CAA)	Completed	Project will not result in permanent air emissions - Review concluded	
Coastal Barrier Resources Act (CBRA)	Not Applicable	Project is not on or connected to CBRA Unit or otherwise protected area - Review concluded	
Clean Water Act (CWA)	Completed	Project would not affect any water of the U.S. - Review concluded	
Coastal Zone Management Act (CZMA)	Not Applicable	Project is not located in a coastal zone area and does not affect a coastal zone area - Review concluded	

RECORD OF ENVIRONMENTAL CONSIDERATION REPORT(REC)

Project ID: PA-07-MO-1980-PW-01573

Title: SMH-007 - Demolition Debris Removal - 403 Emergency PHS

Environmental Law/ Executive Order	Status	Description	Comments
Executive Order 11988 - Floodplains	Completed	No effect on floodplain/flood levels and project outside floodplain - Review concluded	Per 44 CFR part 9.5(c)(12) project is exempt from floodplain management review. - tdean12 - 10/27/2011 15:01:49 GMT
Executive Order 11990 - Wetlands	Completed	No effects on wetlands and project outside wetlands - Review concluded	The nature and type of the work as described in the scope of work has been determined to have no effect on wetlands. - tdean12 - 10/27/2011 15:02:13 GMT
Executive Order 12898 - Environmental Justice for Low Income and Minority Populations	Completed	Low income or minority population in or near project area	
	Completed	No disproportionately high and adverse impact on low income or minority population - Review concluded	
Endangered Species Act (ESA)	Completed	No listed species and/or designated critical habitat present in areas affected directly or indirectly by the federal action - Review concluded	The nature and type of the work as described in the scope of work has been determined to have no effect to threatened or endangered species and/or their designated critical habitat. - tdean12 - 10/27/2011 15:00:19 GMT
Farmland Protection Policy Act (FPPA)	Completed	Project does not affect designated prime or unique farmland - Review concluded	
Fish and Wildlife Coordination Act (FWCA)	Completed	Project does not affect, control, or modify a waterway/body of water - Review concluded	
Migratory Bird Treaty Act (MBTA)	Completed	Project located within a flyway zone	
	Completed	Project does not have potential to take migratory birds - Review concluded	
Magnuson-Stevens Fishery Conservation and Management Act (MSA)	Completed	Project not located in or near Essential Fish Habitat - Review concluded	
National Historic Preservation Act (NHPA)	Completed	Standard Section 106 review	FEMA has determined that there will be No Effect to historic properties. SHPO concurrence with this determination was received, dated August 2, 2011. - tdean12 - 10/27/2011 14:55:18 GMT
	Completed	Building or structure 50 years or older or listed on the National Register in the project area and activity not exempt from review	

RECORD OF ENVIRONMENTAL CONSIDERATION REPORT(REC)

Project ID: PA-07-MO-1980-PW-01573

Title: SMH-007 - Demolition Debris Removal - 403 Emergency PHS

Environmental Law/ Executive Order	Status	Description	Comments
	Completed	Determination of No Historic Properties Affected (FEMA finding/SHPO/THPO concurrence attached) - Review concluded	
	Completed	Project affects only previously disturbed ground - Review concluded	
Resource Conservation and Recovery Act, aka Solid Waste Disposal Act (RCRA)	Completed	Review concluded	Applicant is responsible that handling, managing, transporting, and disposal of debris and/or hazardous materials are performed per federal, state and local debris/hazardous waste regulations or other applicable environmental regulations. All federal, state, and local coordination activities for debris/hazardous waste disposal must be attached as part of projects permanent files. - tdean12 - 10/27/2011 15:03:58 GMT
Wild and Scenic Rivers Act (WSR)	Completed	Project is not along and does not affect Wild and Scenic River - Review concluded	

CONDITIONS

Special Conditions required on implementation of Projects:

The disposal must comply with landfill permit conditions.

Source of condition: Resource Conservation and Recovery Act, aka Solid Waste Disposal Act (RCRA) Monitoring Required: No

If any asbestos containing materials, lead based paint and/or other hazardous materials are found during debris removal activities, the applicant must comply with all federal, state and local abatement and disposal requirements under NESHAP.

Source of condition: Resource Conservation and Recovery Act, aka Solid Waste Disposal Act (RCRA) Monitoring Required: No

Standard Conditions:

Any change to the approved scope of work will require re-evaluation for compliance with NEPA and other Laws and Executive Orders.

This review does not address all federal, state and local requirements. Acceptance of federal funding requires recipient to comply with all federal, state and local laws. Failure to obtain all appropriate federal, state and local environmental permits and clearances may jeopardize federal funding.

If ground disturbing activities occur during construction, applicant will monitor ground disturbance and if any potential archeological resources are discovered, will immediately cease construction in that area and notify the State and FEMA.