

ENVIRONMENTAL ASSESSMENT

Determinations and Compliance Findings for HUD-Assisted Projects

24 CFR Part 58

Responsible Entity: New Jersey Department of Community Affairs (DCA), Richard Constable III, Commissioner

Applicant Name: SRP0043948 – Mohammed Hossain; SRP0043950 – Mohammed Hossain; SRP0043951 – Mohammed Hossain

Project Location: SRP0043948 – 5552-5554 Woodland Avenue, Pennsauken, Camden County, New Jersey, Block 5726, Lot 4; SRP0043950 – 5534-5536 Woodland Avenue, Pennsauken, Camden County, New Jersey, Block 5726, Lot 7; SRP0043951 – 5540-5542 Woodland Avenue, Pennsauken, Camden County, New Jersey, Block 5726, Lot 6

Conditions for Approval [40 CFR 1505.2(c)]: (List all mitigation and project modification measures required by the Responsible Entity to eliminate or minimize adverse environmental impacts. These conditions must be included in project contracts and other relevant documents as required. The staff responsible for implementing and monitoring mitigation measures should be clearly identified in the mitigation plan.)

General

1. Acquire all required federal, state and local permits prior to commencement of construction and comply with all permit conditions.
2. If the scope of work of a proposed activity changes significantly, the application for funding must be revised and resubmitted for reevaluation under the National Environmental Policy Act.

Historic Preservation

3. All activities must comply with Section 106 of the National Historic Preservation Act per the implementing regulations 36 CFR Part 800. Compliance with Section 106 is achieved through the procedures set forth in the Programmatic Agreement among the Federal Emergency Management Agency, the New Jersey State Historic Preservation Officer, the New Jersey State Office of Emergency Management, the Advisory Council on Historic Preservation, the Absentee Shawnee Tribe of Indians of Oklahoma, the Delaware Nation, the Delaware Tribe of Indians, the Shawnee Tribe of Oklahoma, and the Stockbridge Munsee Band of Mohicans, as signed onto by the New Jersey Department of Community Affairs.
4. In the event that archeological deposits, including any Native American pottery, stone tools, bones, or human remains, are uncovered, the project shall be halted and the applicant shall stop all work immediately in the vicinity of the discovery and take reasonable measures to avoid or minimize harm to the finds. All archeological findings will be secured and access to the sensitive area restricted. The applicant will inform FEMA immediately and FEMA will consult with the State Historic Preservation Office (SHPO) or Tribal Historic Preservation Office (THPO) and Tribes and work in sensitive areas cannot resume until consultation is completed and appropriate measures have been taken to ensure that the project is in compliance with the National Historic Preservation Act (NHPA).

Noise

5. During the temporary construction activities, outfit all equipment with operating mufflers.
6. During the temporary construction activities, comply with the applicable local noise ordinance.

Air Quality

Project activities must meet the regulatory requirements of New Jersey's Air Rules and Air Pollution Controls requirements (see LRRP Camden County_AirQualityMemo). In addition, the following must be met:

7. Use water or chemical dust suppressant in exposed areas to control dust.
8. Cover the load compartments of trucks hauling dust-generating materials.
9. Wash heavy trucks and construction vehicles before they leave the site.
10. Reduce vehicle speed on non-paved areas and keep paved areas clean.
11. Retrofit older equipment with pollution controls.
12. Establish and follow specified procedures for managing contaminated materials discovered or generated during construction.
13. Employ spill mitigation measures immediately upon a spill of fuel or other hazardous material.
14. Obtain an air pollution control permit to construct and a certificate to operate for all equipment subject to N.J.A.C. 7:27-8.2(c). Such equipment includes, but is not limited to, the following:
 - a. Any commercial fuel combustion equipment rated with a maximum heat input of 1,000,000 British Thermal Units per hour or greater to the burning chamber (N.J.A.C. 7:27-8.2(c)1);
 - b. Any stationary storage tank for volatile organic compounds with a capacity of 2,000 gallons and a vapor pressure of 0.02 pounds per square inch or greater (N.J.A.C. 7:27-8.2(c)9);
 - c. Any tank, reservoir, container, or bin with capacity in excess of 2,000 cubic feet used for storage of solid particles (N.J.A.C. 7:27-8.2(c)10); and
 - d. Any stationary reciprocating engine with a maximum rated power output of 37 kW or greater, used for generating electricity, not including emergency generators (N.J.A.C. 7:27-8.2(c)21).(Note: One or two family dwellings and dwellings of six or less family units, one of which is owner occupied, are exempt pursuant to NJSA 26:2C-9.2.)
15. Minimize idling and ensure that all on-road vehicles and non-road construction equipment operated at or visiting the project site comply with the applicable smoke and "3-minute idling" limits (N.J.A.C. 7:27-14.3, 14.4, 15.3 and 15.8).
16. Ensure that all diesel on-road vehicles and non-road construction equipment used on or visiting the project site use ultra-low sulfur fuel (<15 ppm sulfur) in accordance with the federal Non-road Diesel Rule (40 CFR Parts 9, 69, 80, 86, 89, 94, 1039, 1051, 1065, 1068).
17. Operate, if possible, newer on-road diesel vehicles and non-road construction equipment equipped with tier 4 engines, or equipment equipped with an exhaust retrofit device.

Erosion and Drainage/Storm Water Runoff

18. Implement and maintain erosion and sedimentation control measures.
19. Minimize soil compaction by minimizing project activities in vegetated areas, including lawns.

Transportation and Accessibility

20. Implement and maintain appropriate traffic control and access maintenance measures.

Hazardous Materials and Solid Waste Disposal/Recycling

- 21. All activities must comply with applicable federal, state, and local laws and regulations regarding asbestos, including but not limited to the following:
 - a. National Emission Standard for Asbestos, standard for demolition and renovation, 40 CFR 61.145
 - b. National Emission Standard for Asbestos, standard for waste disposal for manufacturing, fabricating, demolition, and spraying operations, 40 CFR 61.150
 - c. NJAC 7:26-2.12—Generator requirements for disposal of asbestos containing waste materials
 - d. New Jersey Asbestos Control and Licensing Act, N.J.S.A. 34:5A-32 et seq.
- 22. Applicant must comply with all laws and regulations concerning the proper handling, removal and disposal of hazardous materials (e.g. asbestos, lead-based paint) or household waste (e.g. construction and demolition debris, pesticides/herbicides, white goods).
- 23. All activities must comply with applicable federal, state, and local laws and regulations regarding lead-based paint, including but not limited to HUD’s lead-based paint regulations in 24 CFR Part 35 Subparts B, H, and J.
- 24. All residential structures must be free of mold attributable to Superstorm Sandy.
- 25. Comply with all laws, regulations, and industry standards applicable to aboveground and underground storage tanks, including the New Jersey underground storage tank regulations at NJAC 7:14B.

Sole Source Aquifers

- 26. Impervious surface coverage must not increase by more than 75% on any of the proposed activity sites.

FINDING:

Finding of No Significant Impact (FONSI) [24 CFR 58.40(g)(1); 40 CFR 1508.27]

(The project will not result in a significant impact on the quality of the human environment.)

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

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

CERTIFICATIONS:

Jennifer Angell, CDM Smith
Preparer Name and Agency


Preparer Signature

January 15, 2015
Preparer Completion Date

Richard Constable, III
RE Certifying Officer Name

RE Certifying Officer Signature

RE CO Signature Date

Funding Information:

Grant Number	HUD Program	Funding Amount
B-13-DS-34-0001	Landlord Rental Repair Program	\$600,000.00

Estimated Total HUD Funded Amount:

The proposed reconstruction project will be funded with a maximum total of up to \$600,000 in U.S. Department of Housing and Urban Development (HUD) Community Development Block Grant – Disaster Recovery (CDBG-DR) Landlord Rental Repair Program (LRRP) grant funds for 12 total units at three properties. The maximum LRRP funding is \$50,000 per damaged unit.

Estimated Total Project Cost [24 CFR 58.32(d)]: (HUD and non-HUD funds)

The proposed reconstruction project will be funded with a maximum total of up to \$600,000 in HUD CDBG-DR LRRP grant funds for 12 total units at three properties. Each applicant is responsible for any additional private monies (non-HUD funds) as necessary to complete each project. The maximum LRRP funds that each property is eligible for is listed in the table below.

Applicant ID	Address	City	# of Units	Maximum LRRP Funds
SRP0043948	5552-5554 Woodland Avenue	Pennsauken	4	\$ 200,000.00
SRP0043950	5534-5536 Woodland Avenue	Pennsauken	4	\$ 200,000.00
SRP0043951	5540-5542 Woodland Avenue	Pennsauken	4	\$ 200,000.00

Statement of Purpose and Need for the Proposal [40 CFR 1508.9(b)]:

The State of New Jersey was included in the HUD CDBG-DR program pursuant to the Disaster Relief Appropriations Act of 2013 (Public Law 113-2, approved January 29, 2013). On October 29, 2012, Superstorm Sandy made landfall over the New Jersey coast. The storm surge inundated and severely affected the State’s shoreline from Cape May to Raritan Bay, along the Hudson River, and on the estuaries connecting to Raritan Bay and Newark Bay. Other overland flooding, wind damage and an ensuing snowstorm further damaged these communities as well as other communities throughout New Jersey.

The New Jersey Department of Community Affairs’ (NJDEA) proposed LRRP will restore or create multi-family housing developments of up to 25 units. Often, this rental type is provided by a homeowner that has an extra unit that contributes rental income to the owner, or by landlords with fewer than 25 properties. The rental repair program will provide grants to existing and new owners of rental properties with 1 to 25 units requiring significant rehabilitation. The purpose of the proposed project is to assist rental property owners in Camden County rebuild their damaged properties. The proposed project will meet an urgent need to provide safe, decent and affordable rental housing.

Description of the Proposed Project [24 CFR 50.12 & 58.32, 40 CFR 1508.25]: (Include all contemplated actions that are logically either geographically or functionally a composite part of the project, regardless of the source of funding. As appropriate, attach maps, site plans, renderings, photographs, budgets, and other descriptive information.)

Project type: Reconstruction of multi-family rental properties

Project description: The proposed project would reconstruct three multi-family rental properties in Pennsauken Township, Camden County, New Jersey. Reconstruction would include demolishing the existing buildings on the properties and constructing new buildings consisting of the same number of units. The properties are identified as the lots encompassing the following addresses: SRP0043948, 5552-5554 Woodland Avenue; SRP0043950, 5534-5536 Woodland Avenue; and SRP0043951, 5540-5542 Woodland Avenue. The details of each property are described below.

1. SRP0043948: The lot for this application contains a 2-story residential structure built in 1940 with a total of four units. The lot size is 0.18 acres. The structure is attached to an identical structure not included as part of this environmental review.
2. SRP0043950: The lot for this application contains a 2-story residential structure built in 1940 with a total of four units. The lot size is 0.12 acres. The structure is attached to an identical structure included as part of this environmental review (SRP0043951 below).
3. SRP0043951: The lot for this application contains a 2-story residential structure built in 1940 with a total of four units. The lot size is 0.12 acres. The structure is attached to an identical structure included as part of this environmental review (SRP0043950 above).

The tax cards for the proposed activity sites are provided as attachment LRRP Camden County_TaxCards. The general location map shows the general distribution of the proposed activity sites that are part of this environmental review and the site location maps show a more zoomed-in view of the proposed activity sites and their surrounding area (see LRRP Camden County_GeneralLocationMap and LRRP Camden County_SiteLocationMap).

Reconstruction is to assist owners of properties that were so severely damaged as a result of the storm that repair is not feasible or would not be cost effective. When applicable, the completed reconstructed structures will be built to the 2009 Residential International Code and will meet the energy efficiency guidelines of the U.S. Environmental Protection Agency (EPA)'s Energy STAR program.

Existing Conditions and Trends [24 CFR 58.40(a)]: (Describe the existing conditions of the project area and its surroundings, and the trends likely to continue in the absence of the project.)

The proposed activity sites are located in an urban area. The project area is in a mixed-use area, with residential and commercial properties. The proposed activity sites are developed multi-family rental properties and vegetation is limited to grass, scattered trees, and conventional landscaping. The rental properties that are part of this environmental review were damaged as a result of Superstorm Sandy in October 2012. The project area is currently undergoing efforts to recover from the damage caused by Superstorm Sandy. In the absence of the proposed project, the multi-family rental properties will remain damaged.

PART I: STATUTORY CHECKLIST [24 CFR 50.4, 24 CFR 58.5]

DIRECTIONS – For each authority, check either Box “A” or “B” under “Status.”

“A box” The project is in compliance, either because: (1) the nature of the project does not implicate the authority under consideration, or (2) supporting information documents that project compliance has been achieved. In either case, information must be provided as to WHY the authority is not implicated, or HOW compliance is met; OR

“B box” The project requires an additional compliance step or action, including, but not limited to, consultation with or approval from an oversight agency, performance of a study or analysis, completion of remediation or mitigation measure, or obtaining of license or permit.

IMPORTANT: Compliance documentation consists of verifiable source documents and/or relevant base data. Appropriate documentation must be provided for each law or authority. Documents may be incorporated by reference into the ERR provided that each source document is identified and available for inspection by interested parties. Proprietary material and studies that are not otherwise generally available for public review shall be included in the ERR. Refer to HUD guidance for more information.

Statute, Authority, Executive Order, Regulation, or Policy cited at 24 CFR §50.4 & §58.5	STATUS		Compliance Documentation
	A	B	
<p>1. Air Quality [Clean Air Act, as amended, particularly sections 176(c) & (d), and 40 CFR 6, 51, 93]</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>The proposed project is in compliance. The proposed project is in Camden County, which is listed as being in nonattainment or maintenance for five National Ambient Air Quality Standards (NAAQS) by the U.S. Environmental Protection Agency (USEPA). Camden County is listed as being in moderate nonattainment of the 1997 8-hour ozone standard and in marginal nonattainment of the 2008 8-hour ozone standard. Camden County is listed as being in maintenance of the 1997 and 2006 PM-2.5 standard and the carbon monoxide standard. NAAQS maps are provided as attachment LRRP Camden County_AirQualityMaps.</p> <p>In a memorandum dated January 23, 2014 from the New Jersey Department of Environmental Protection (NJDEP) Division of Air Quality, residential and commercial construction activities associated with CDBG-DR efforts are well below de minimus thresholds and are presumed to conform to the State Implementation Plan. The memorandum further states that compliance with the regulatory requirements of New Jersey’s Air Rules and the State’s Air Pollution Control requirements continue to remain in effect (see LRRP Camden County_AirQualityMemo).</p> <p>Sources: USEPA, Green Book, National Area and County-Level Multi-Pollutant Information, http://www.epa.gov/airquality/greenbook/multipol.html; NJDEP, Bureau of Air Quality Planning, Attainment Areas Status, http://www.state.nj.us/dep/baqp/aas.html#co1</p>

<p>2. Airport Hazards (Clear Zones and Accident Potential Zones) [24 CFR 51D]</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>The proposed project is in compliance. The proposed project area, at its closest, is approximately 26 miles from Trenton Mercer Airport, nearly 42 miles from Atlantic City International Airport, and approximately 68 miles from Newark Liberty International Airport. Lakehurst Naval Air Station is the only military airport of concern in New Jersey. The proposed project area, at its closest, is approximately 35 miles from this military airport. See LRRP Camden County_AirportHazardsMap.</p> <p>Sources: NJDEP HUD Environmental Review Tool 2.1; aerial imagery accessed in Google™ Earth</p>
<p>3. Coastal Zone Management [Coastal Zone Management Act sections 307(c) & (d)]</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>The proposed project is in compliance. None of the proposed activity sites are located within the Coastal Area Facility Review Act (CAFRA) zone, Hackensack Meadowlands, or Upland Waterfront Development zone (see LRRP Camden County_CoastalZoneManagementActMap).</p> <p>Source: NJDEP HUD Environmental Review Tool 2.1</p>
<p>4. Contamination and Toxic Substances [24 CFR 50.3(i) & 58.5(i)(2)]</p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<p>The proposed project is in compliance. None of the proposed activity sites are within the 3,000-foot radius of a hazardous waste cleanup site, landfill, solid waste cleanup site or hazardous waste facility that handles hazardous materials or toxics substances, based on NJDEP's known contaminated sites layer (see LRRP Camden County_ToxicHazardousandRadioactiveSubstancesMap).</p> <p>The proposed activity sites are not listed on a State or Federal hazardous waste sites database.</p> <p>Site reconnaissance, conducted by Sadat Associates on November 6, 2014, revealed no visible recognized environmental conditions (RECs) on or in the vicinity of the proposed activity sites. A photo log for each proposed activity site is provided as attachment LRRP Camden County_SiteInspectionPhotologs.</p> <p>Asbestos is of concern if a structure was constructed prior to 1980 and lead-based paint is of concern if a structure was constructed prior to 1978. Based on the age of construction, the structures on all sites may contain asbestos and lead-based paint (see LRRP Camden County_TaxCards). Contractors must determine if these toxics are present. If present, these toxics must be addressed in accordance with all applicable federal, state, and local laws and regulations</p> <p>The proposed activity sites are located in a Tier 3 area, which is considered a low radon potential area (see LRRP Camden County_RadonPotentialMap). No radon testing or mitigation is required for sites located in a Tier 3 area.</p> <p>Sources: NJDEP Known Contaminated Site List for New Jersey (Non-Homeowner), Edition 201404; NJDEP, Radon Potential, http://www.njradon.org/radonin.htm</p>

<p>5. Endangered Species [Endangered Species Act of 1973, particularly section 7; 50 CFR 402]</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>The proposed project is in compliance. The New Jersey Division of Fish and Wildlife’s lists of endangered and threatened wildlife species were reviewed. The proposed project would not impact the listed species because the proposed activity sites are developed multi-family properties. A request for a Natural Heritage Program (NHP) database review was submitted to the NJDEP Office of Natural Lands Management. In a letter dated November 18, 2014, the NHP provided tables showing the data request search results. No rare plant species, ecological communities, rare wildlife species, or wildlife habitat were found to be present on any of the proposed activity sites or in the immediate vicinity (within ½ mile). A copy of the letter is provided as attachment LRRP Camden County_NHPResponse.</p> <p>The U.S. Fish and Wildlife Service (USFWS) Information, Planning, and Conservation System (IPaC) was consulted to obtain a preliminary USFWS species list for the proposed activity sites. No Endangered Species Act species or critical habitats were listed within the vicinity of the proposed activity sites (see LRRP Camden County_USFWS_IPaC). There were migratory birds listed within the vicinity of the proposed activity sites; however, the proposed activity sites are developed multi-family properties and therefore, the proposed project is not anticipated to impact migratory birds.</p> <p>Source: USFWS, Information, Planning, and Conservation (IPaC) System, http://ecos.fws.gov/ipac/; New Jersey Division of Fish and Wildlife, New Jersey’s Endangered and Threatened Wildlife, http://www.state.nj.us/dep/fgw/tandespp.htm</p>
<p>6. Environmental Justice [Executive Order 12898]</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>The proposed project is in compliance. Between 30 and 40 percent of the population within the proposed project area and its immediate vicinity is considered minority, and less than 10 percent is considered to be living below the poverty threshold (see LRRP Camden County_EnvironmentalJusticeMaps).</p> <p>As indicated by the other sections of this environmental assessment, the proposed project would have no significant adverse environmental impacts. The proposed project would therefore have no significant disproportionate adverse environmental impact on minority and low-income residents of the proposed project areas (see LRRP Camden County_EnvironmentalJusticeChecklist).</p> <p>Source: USEPA, EJView, http://epamap14.epa.gov/ejmap/entry.html</p>
<p>7. Explosive and Flammable Operations [24 CFR 51C]</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>The proposed project is in compliance. Per HUD guidance, in cases where disaster funds will be used to elevate, rehabilitate or reconstruct housing on a site where housing previously existed before the disaster, 24 CFR Part 51, Subpart C does not apply if the number of dwelling units on the site is not increased. The proposed project would not increase the number of dwelling units on any of the proposed activity sites.</p>
<p>8. Farmland Protection [Farmland Protection Policy Act of 1981, particularly section 1504(b) & 1541; 7 CFR 658]</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>The proposed project is in compliance. The proposed activity sites are developed multi-family properties located in an urban area and are zoned R-4, which is residential development (see LRRP Camden County_PennsaukenZoningMap). Therefore, there would be no effect</p>

			<p>on farmland.</p> <p>Source: Pennsauken Township, http://www.twp.pennsauken.nj.us/content/zoning-maps</p>
<p>9. Floodplain Management [24 CFR 55; Executive Order 11988, particularly section 2(a)]</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>The proposed project is in compliance. The proposed activity sites are outside the 100-year floodplain (A and V Zones), as shown on Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM) panel 34007C0029E dated September 28, 2007 (see LRRP Camden County_FloodplainManagementMap). The proposed activity sites are located in Zone X, an area of low to moderate risk, and is not of concern to the proposed project.</p> <p>Source: FEMA, Flood Map Service Center, http://msc.fema.gov/portal</p>
<p>10. Historic Preservation [National Historic Preservation Act of 1966, particularly sections 106 & 110; 36 CFR 800]</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>The proposed project is in compliance. The proposed activity sites are outside a historic property exemption zone (see LRRP Camden County_HistoricPreservationExemptionZoneMap). Form 1s were completed by J. Howard Beverly, Jr., RPA, GISP, a Secretary of Interior (SOI) qualified archaeologist, and Robert W. Ball, RPA, a SOI-qualified architect, for the proposed activity sites and submitted to the NJDEP Historic Preservation Office requesting concurrence with a no historic properties affected finding. In responses received December 8, 2014, the Deputy State Historic Preservation Officer concurred with a no historic properties affected finding for the proposed activity sites. Copies of the responses are provided as attachment LRRP Camden County_SHPOResponses.</p> <p>Source: NJDEP HUD Environmental Review Tool 2.1</p>
<p>11. Noise Abatement and Control [Noise Control Act of 1972, as amended by the Quiet Communities Act of 1978; 24 CFR 51B]</p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<p>The proposed project is in compliance. Per HUD guidance, noise analysis is not applicable for projects under the LRRP disaster recovery program that meet the requirements of 24 CFR 51.101(a)(3). The proposed project would not increase residential density and has the effect of restoring the multi-family properties as they existed prior to the disaster.</p> <p>Construction noise will be a temporary impact that will be controlled by best management practices (BMPs). Construction noise will be within applicable city, state and federal codes. Thus, construction noise is not expected to have an impact to the project or surrounding areas.</p>
<p>12. Sole Source Aquifers [Safe Drinking Water Act of 1974, as amended, particularly section 1424(e); 40 CFR 149]</p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<p>The proposed project is in compliance. The proposed activity sites are within the Coastal Plain sole source aquifer (see LRRP Camden County_SoleSourceAquiferMap). The proposed activity sites are serviced by existing public water through the Merchantville – Pennsauken Water Commission and serviced by existing public sewer through the Pennsauken Sewerage Authority.</p> <p>According to a letter dated August 13, 1996 from the USEPA Region III, proposed projects that do not have the potential to create a significant hazard to public health by adversely impacting groundwater are considered exempt from a sole source aquifer review. The proposed project would reconstruct multi-family</p>

		<p>properties in a developed urban area. The proposed project would not adversely impact groundwater. A copy of the letter is provided as attachment LRRP Camden County_EPASoleSourceAquiferLetter. An e-mail dated December 31, 2014 from Donna Mahon of NJDEP confirmed that the August 13, 1996 letter from USEPA would apply to the proposed project, conditioned on impervious surface coverage not increasing by more than 75% (see LRRP Camden County_SoleSourceAquiferEmail). The proposed project must not increase the impervious surface coverage by more than 75% on any of the proposed activity sites.</p> <p>Sources: NJDEP HUD Environmental Review Tool 2.1; Pennsauken Sewerage Authority, http://psewer.com; Merchantville – Pennsauken Water Commission, http://www.mpwc.com</p>
<p>13. Wetland Protection [24 CFR 55, Executive Order 11990, particularly sections 2 & 5]</p>	<p><input checked="" type="checkbox"/> <input type="checkbox"/></p>	<p>The proposed project is in compliance. Mapped wetlands are not shown on or in the vicinity of any of the proposed activity sites (see LRRP Camden County_WetlandProtectionMap). Site reconnaissance, conducted by Sadat Associates on November 6, 2014 revealed no evidence of unmapped wetlands on or in the vicinity of any of the proposed activity sites.</p> <p>Source: NJDEP 2007 Land use/Land Cover Update, Lower Delaware Watershed Management Area, WMA18 Edition: 20100712</p>
<p>14. Wild and Scenic Rivers [Wild and Scenic Rivers Act of 1968, particularly section 7(b) & (c); 36 CFR 297]</p>	<p><input checked="" type="checkbox"/> <input type="checkbox"/></p>	<p>The proposed project is in compliance. The proposed activity sites are not located within ¼-mile of the stream bank of a designated wild and scenic river or within a one-mile radius of a designated wild and scenic river. The proposed project area, at its closest, is approximately 20 miles from the designated segment of the Great Egg Harbor River, approximately 25 miles from the designated segment of the Lower Delaware River, approximately 50 miles from the designated segment of the Musconetcong River, and approximately 70 miles from the designated segment of the Middle Delaware River (see LRRP Camden County_WildandScenicRiversMap).</p> <p>Sources: NJDEP HUD Environmental Review Tool 2.1; National Wild and Scenic Rivers System, Explore Designated Rivers, New Jersey http://www.rivers.gov/new-jersey.php</p>

PART II: ENVIRONMENTAL ASSESSMENT CHECKLIST

[24 CFR 58.40; 40 CFR 1508.8 & 1508.27]

For each impact category, evaluate the significance of the effects of the proposal on the character, features, and resources of the project area. Enter relevant base data and credible, verifiable source documentation to support the finding. Note names, dates of contact, telephone numbers, and page references. Attach additional material as appropriate. **All conditions, attenuation, or mitigation measures have been clearly identified.**

Impact Codes:

- (1) no impact anticipated
- (2) potentially beneficial
- (3) potentially adverse- requires documentation
- (4) requires mitigation
- (5) significant/potentially significant adverse impact requiring avoidance or modification which may require an Environmental Impact Statement

Impact Categories	Impact Code	Impact Evaluation, Source Documentation and Mitigation or Modification Required
Land Development		
Conformance with Comprehensive and Neighborhood Plans	1	Pennsauken Township operates under an adopted master plan. The proposed project is consistent with this plan.
Land Use Compatibility and Conformance with Zoning	1	The reconstructed multi-family rental properties would be compatible with the existing surrounding urban development. Reconstructing damaged properties as they existed prior to Superstorm Sandy would conform to existing zoning.
Urban Design- Visual Quality and Scale	2	The proposed project would restore damaged multi-family rental properties as they existed prior to Superstorm Sandy. The proposed project would improve visual quality by reconstructing damaged properties.
Slope	1	The proposed project areas do not contain steep slopes and the proposed project would not create steep slopes. The stability of the proposed activity sites would not be a concern for the proposed project.
Erosion	4	The proposed project has the potential to cause erosion. BMPs must be implemented to minimize erosion and sedimentation (see Conditions for Approval and Required Mitigation and Project Modification Measures).
Soil Suitability	1	The proposed activity sites are developed multi-family properties located in an urban area. The soil has supported urban development in the past and therefore soil suitability is not a concern for the proposed project.
Hazards and Nuisances, Including Site Safety	1	The proposed project areas contain no unusual hazards, nuisances or safety concerns.
Drainage/Storm Water Runoff	4	The proposed project would create the potential for stormwater runoff to cause erosion and sedimentation. BMPs would be required to minimize erosion and sedimentation (see Conditions for Approval and Required Mitigation and Project Modification Measures).

Noise-Effects of Ambient Noise on Project & Contribution to Community Noise Levels	4	There would be temporary, unavoidable increases in noise levels at nearby residences during the reconstruction of structures. Noise impacts would be mitigated to the greatest extent feasible (see Conditions for Approval and Required Mitigation and Project Modification Measures). The completed project would generate minimal, typical residential noise. The noise in the proposed project area would be consistent with what existed prior to Superstorm Sandy.
Energy Consumption	1	The proposed project would not consume a significant amount of energy, except for a typical amount during the construction phase. The proposed project would restore multi-family rental properties as they existed prior to Superstorm Sandy.
Socioeconomic Factors		
Demographic Character Changes	1	The proposed project would have no effect on the demographic character of the proposed project area. The proposed project would restore multi-family rental properties as they existed prior to Superstorm Sandy.
Displacement	1	The proposed project would not displace any residents or businesses. The proposed project would restore multi-family rental properties as they existed prior to Superstorm Sandy.
Employment and Income Patterns	1	The proposed project would have no effect on employment and income patterns in the proposed project area. The proposed project would restore multi-family rental properties as they existed prior to Superstorm Sandy.
Community Facilities and Services		
Educational Facilities	1	The proposed project would not affect the demand for educational facilities or interfere with delivery of educational services. The nearest educational facility to the proposed activity sites is Martin Luther Christian School, a preschool through 6 th grade school located at 4106 Terrace Avenue, Pennsauken. The school is located approximately 0.1 miles east of the proposed activity sites. Source: Aerial imagery accessed in Google™ Earth Pro
Commercial Facilities	1	The proposed project would not affect the demand for commercial facilities or interfere with the operation of commercial facilities. There are a variety of fast food restaurants, auto repair shops, retail stores, and insurance agencies located along the Route 130 corridor, located adjacent to the proposed activity sites. Source: Aerial imagery accessed in Google™ Earth Pro
Health Care	1	The proposed project would not affect the demand for health care or interfere with delivery of health care. The nearest hospital to the proposed activity sites is Our Lady of Lourdes Medical Center at 1600 Haddon Avenue, Camden, approximately 1.7 miles southwest. Source: Aerial imagery accessed in Google™ Earth Pro

Social Services	1	<p>The proposed project would not affect the demand for social services or interfere with delivery of social services. Local social services include the Hispanic Family Center of Southern New Jersey at 35-47 S. 29th Street, Camden, approximately 0.7 miles west from the proposed activity sites and Catholic Charities at 2830 Marlton Pike, Pennsauken, approximately 0.7 miles southwest of proposed activity sites. Camden County Social Services Board at 600 Market Street, Camden is 2.6 miles from the proposed project sites.</p> <p>Sources: Camden County http://www.camdencounty.com/government/offices-departments/board-social-services, aerial imagery accessed in Google™ Earth Pro</p>
Solid Waste Disposal/Recycling	4	<p>The proposed project would generate construction and demolition debris, but would not increase long-term generation of solid waste. Asbestos is of concern if a structure was constructed prior to 1980 and lead-based paint is of concern if a structure was constructed prior to 1978. Based on the age of construction, may contain asbestos and lead-based paint (see LRRP Camden County_TaxCards). These hazardous materials, as well as construction and demolition debris, must be handled and disposed of in accordance with applicable federal, state, and local laws and regulations (see Conditions for Approval and Required Mitigation and Project Modification Measures).</p> <p>The proposed activity sites are currently provided solid waste disposal/recycling services through the Pennsauken Township Public Works Department.</p> <p>Source: Pennsauken Township, http://www.twp.pennsauken.nj.us/pw/public-works</p>
Waste Water/Sanitary Sewers	1	<p>The proposed project would not affect the wastewater collection, treatment, and disposal system. The proposed activity sites are serviced by existing public sewer through the Pennsauken Sewerage Authority.</p> <p>Source: Pennsauken Sewerage Authority, http://psewer.com/</p>
Water Supply	1	<p>The proposed project would not consume an unusual quantity of water and would not affect the water supply system. The proposed activity sites are serviced by existing public water through the Merchantville – Pennsauken Water Commission.</p> <p>Source: Merchantville – Pennsauken Water Commission, http://www.mpwc.com</p>

<p>Public Safety:</p> <ul style="list-style-type: none"> • Police • Fire • Emergency Medical 	1	<p>The proposed project would not affect the demand for public safety services such as police, fire, and emergency medical or interfere with delivery of these services. The proposed activity sites are served by Bloomfield Park Volunteer Fire Company No. 1 at 5301 Lexington Avenue, approximately 0.8 miles southeast. The Pennsauken police station located at 2400 Bethel Avenue is 1.8 miles northeast of the proposed activity sites.</p> <p>Sources: Pennsauken Township, http://www.twp.pennsauken.nj.us/police/about-pennsauken-police, and http://www.twp.pennsauken.nj.us/firedept/stations-units; Aerial imagery accessed in Google™ Earth Pro</p>
<p>Parks, Open Space & Recreation:</p> <ul style="list-style-type: none"> • Open Space • Recreation 	1	<p>The proposed project would not affect any park, open space or recreational facilities. The closest park to the proposed activity sites is Dudley Grange Park, located approximately 0.4 miles northeast.</p> <p>Source: Aerial imagery accessed in Google™ Earth Pro</p>
<p>Cultural Facilities</p>	1	<p>The proposed project would not affect any cultural facilities. The Pennsauken Free Public Library at 5605 N. Crescent Boulevard is approximately 1.1 miles from the proposed activity sites. Camden County Historical Society at 1900 Park Boulevard, Camden is approximately 1.5 miles southwest from the proposed activity sites.</p> <p>Source: Aerial imagery accessed in Google™ Earth Pro</p>
<p>Transportation & Accessibility</p>	4	<p>The proposed project would not create a significant additional demand for transportation services or interfere with the overall transportation network. The proposed activity sites are in a developed urban area sufficiently served by existing roads.</p> <p>Construction activities would increase traffic by construction equipment and worker commuting; however, this will be minimal and short-term. BMPs will be employed to prevent impeding traffic flow by construction equipment (see Conditions for Approval and Required Mitigation and Project Modification Measures).</p>
Natural Features		
<p>Water Resources</p>	1	<p>The proposed project would not involve significant water withdrawals and would not have a significant effect on water resources.</p>
<p>Surface Water</p>	1	<p>The proposed project would have no effect on surface water. The closest surface water is the Cooper River, approximately one mile southwest.</p> <p>Source: Aerial imagery accessed in Google™ Earth Pro</p>
<p>Unique Natural Features & Agricultural Lands</p>	1	<p>The proposed activity sites are in a developed urban area and the proposed project would not affect agricultural lands. There are no unique natural features on or in the vicinity of the proposed activity sites.</p>
<p>Vegetation and Wildlife</p>	1	<p>The proposed activity sites are developed multi-family rental properties located in an urban area. Vegetation is limited to grass, scattered trees, and conventional landscaping. No significant vegetation or wildlife would be affected by the proposed project.</p>

PART III: 58.6 CHECKLIST [24 CFR 50.4, 24 CFR 58.6]

1. AIRPORT RUNWAY CLEAR ZONES AND CLEAR ZONES NOTIFICATION [24 CFR Part 51.303(a)(3)]

Does the project involve the sale or acquisition of property located within a Civil Airport Runway Clear Zone or a Military Airfield Clear Zone?

No. Cite or attach Source Documentation:

The proposed project is in compliance. The proposed project area, at its closest, is approximately 26 miles from Trenton Mercer Airport, nearly 42 miles from Atlantic City International Airport, and approximately 68 miles from Newark Liberty International Airport. Lakehurst Naval Air Station is the only military airport of concern in New Jersey. The proposed project area, at its closest, is approximately 35 miles from this military airport. See LRRP Camden County_AirportHazardsMap.

[Project complies with 24 CFR 51.303(a)(3).]

Yes. Notice must be provided to the buyer. The notice must advise the buyer that the property is in a Runway Clear Zone or Clear Zone, what the implications of such a location are, and that there is a possibility that the property may, at a later date, be acquired by the airport operator. The buyer must sign a statement acknowledging receipt of this information, and a copy of the signed notice must be maintained in the ERR.

2. COASTAL BARRIERS RESOURCES ACT [Coastal Barrier Resources Act, as amended by the Coastal Barrier Improvement Act of 1990 (16 USC 3501)]

Is the project located in a coastal barrier resource area?

No. Cite or attach Source Documentation:

The proposed project is in compliance. All proposed activity sites are located outside a coastal barrier resource area (see LRRP Camden County_CoastalBarrierResourcesMap).

[Proceed with project.]

Yes. Federal assistance may not be used in such an area.

3. FLOOD DISASTER PROTECTION ACT [Flood Disaster Protection Act of 1973 and National Flood Insurance Reform Act of 1994 (42 USC 4001-4128 and 42 USC 5154a)]

Does the project involve acquisition, construction, or rehabilitation of structures located in a FEMA-identified Special Flood Hazard Area (SFHA)?

No. Cite or attach Source Documentation:

The proposed activity sites are outside the 100-year floodplain (A and V Zones), as shown on FEMA FIRM panel 34007C0029E dated September 28, 2007 (see LRRP Camden County_FloodplainManagementMap). The proposed activity sites are located in Zone X, an area of low to moderate risk, and is not of concern to the proposed project.

[Proceed with project.]

Yes. Cite or attach Source Documentation:

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. If HUD assistance is provided as a grant, insurance must be maintained for the economic life of the project and in the amount of the total project cost (or up to the maximum allowable coverage, whichever is less). If HUD assistance is provided as a loan, insurance must be maintained for the term of the loan and in the amount of the loan (or up to the maximum allowable coverage, whichever is less). A copy of the flood insurance policy declaration must be kept on file in the ERR.

No. Federal assistance may not be used in the Special Flood Hazard Area.

Summary of Findings and Conclusions

Additional Studies Performed: (List the reports, studies, or analyses performed for this assessment, and attach studies or summaries.)

No additional studies were performed.

Field Inspection (Date and completed by):

Field inspections were completed for the proposed project on November 6, 2014 by Sadat Associates.

List of Sources, Agencies, and Persons Consulted [40 CFR 1508.9(b)]: (List sources, agencies, and persons consulted for this assessment.)

Camden County. Accessed at <http://www.camdencounty.com>.

Federal Emergency Management Agency (FEMA). Flood Map Service Center. Accessed at <http://msc.fema.gov/portal>.

Google™ Earth Pro

National Wild and Scenic Rivers System. Explore Designated Rivers, New Jersey. Accessed at <http://www.rivers.gov/new-jersey.php>.

New Jersey Association of County Tax Boards. Accessed at <http://www.njactb.org/>.

New Jersey Department of Environmental Protection (NJDEP) 2007 Land use/Land Cover Update, Lower Delaware Watershed Management Area, WMA18 Edition: 20100712.

NJDEP Bureau of Air Quality Planning. Attainment Areas Status. Accessed at <http://www.state.nj.us/dep/baqp/aas.html#co1>.

NJDEP Division of Air Quality. Memorandum received from William O'Sullivan, Director, January 23, 2014.

New Jersey Division of Fish and Wildlife. New Jersey's Endangered and Threatened Wildlife. Accessed at <http://www.state.nj.us/dep/fgw/tandespp.htm>.

NJDEP. E-mail received from Donna Mahon, December 31, 2014.

NJDEP Historic Preservation Office. Letters received from Daniel D. Saunders, Deputy State Historic Preservation Officer, December 8, 2014.

NJDEP HUD Environmental Review Tool 2.1. Accessed at <http://www.arcgis.com/explorer/?open=ac492b24c7cc472ea5cf2f57cfaf65ab&extent=-8643120.11643555,4661682.34020292,-7976191.21469309,5121911.72760389>.

NJDEP Known Contaminated Site List for New Jersey (Non-Homeowner), Edition 201404.

NJDEP Radon Potential. Accessed at <http://www.njradon.org/radonin.htm>.

NJDEP State Forestry Service Natural Heritage Program. Letter received from Robert J. Cartica, Administrator, November 18, 2014.

Merchantville - Pennsauken Water Commission. Accessed at <http://www.mpwc.com/>.

Pennsauken Township. Accessed at <http://www.twp.pennsauken.nj.us/>.

Pennsauken Sewerage Authority. Accessed at <http://psewer.com/>.

U.S. Department of Housing and Urban Development (HUD). Region X Environmental Office Environmental Justice Checklist. Accessed at <http://www.hud.gov/local/shared/working/r10/environment/justice.pdf>.

U.S. Environmental Protection Agency (USEPA). EJView. Accessed at <http://epamap14.epa.gov/ejmap/entry.html>.

USEPA. Green Book, National Area and County-Level Multi-Pollutant Information. Accessed at <http://www.epa.gov/airquality/greenbook/multipol.html>.

USEPA Region III. Letter received from Barbara Smith, SSA Project Manager, August 13, 1996.

U.S. Fish and Wildlife Service (USFWS). Coastal Barrier Resources System Mapper. Accessed at <http://www.fws.gov/CBRA/Maps/Mapper.html>.

USFWS. Information, Planning, and Conservation (IPaC) System. Accessed at <http://ecos.fws.gov/ipac/>.

Lists of Permits Required:

No permits were determined to be required through the consultations completed for this environmental assessment. This does not alleviate the requirement of the applicants obtaining all required federal, state, and local permits before beginning construction

Public Outreach [24 CFR 50.23 & 58.43]:

A combined public notice for the proposed project (Notice of Finding of No Significant Impact and Notice of Intent to Request Release of Funds) will be published in the Courier-Post and a Spanish translation of the notice will be published in the Reporte Hispano. Any substantive comments received will be addressed and incorporated into the final environmental assessment document.

Cumulative Impact Analysis [24 CFR 58.32]:

The proposed project would not contribute to adverse cumulative impacts on environmental resources. The proposed project would reconstruct multi-family rental properties. Reconstruction will have a cumulative benefit in the area by restoring these properties as they existed prior to Superstorm Sandy.

Camden County is currently undergoing efforts to recover from the damage caused by Superstorm Sandy in October 2012, and the proposed LRRP is a part of those efforts. Cumulatively, these activities may have temporary impacts on the air quality, noise, and traffic during the implementation phase of these recovery efforts, but these activities will have the long-term benefit of restoring the way of life for New Jersey residents.

Project Alternatives Considered [24 CFR 58.40(e), 40 CFR 1508.9]: (As appropriate, 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 for each alternative and the reasons for rejecting it.)

Other than the no action alternative, no other alternatives were considered, as they would not serve to meet the purpose of helping the property owner rebuild.

No Action Alternative [24 CFR 58.40(e)]:

The no action alternative would avoid the short-term construction impacts, but leaving the multi-family rental buildings in a damaged state would leave the buildings vulnerable to further damage and would not help in the restoration of New Jersey's storm-impacted communities. The no action alternative would not address the State's need for safe, decent, and affordable housing. Therefore, the no action alternative was rejected.

Summary Statement of Findings and Conclusions:

The proposed project would address the need to provide safe, decent and affordable rental housing in Camden County. The proposed project is in compliance with all applicable statutory authorities and would have no significant impact on the environment. Mitigation measures to minimize any potential adverse environmental impacts and to ensure that the proposed project is in compliance with the statutory authorities are identified in the Required Mitigation and Project Modification Measures section below and the Conditions for Approval section at the beginning of this environmental assessment.

Required Mitigation and Project Modification Measures: [24 CFR 58.40(d), 40 CFR 1505.2(c), 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.)

General

1. Acquire all required federal, state and local permits prior to commencement of construction and comply with all permit conditions.
2. If the scope of work of a proposed activity changes significantly, the application for funding must be revised and resubmitted for reevaluation under the National Environmental Policy Act.

Historic Preservation

3. All activities must comply with Section 106 of the National Historic Preservation Act per the implementing regulations 36 CFR Part 800. Compliance with Section 106 is achieved through the procedures set forth in the Programmatic Agreement among the Federal Emergency Management Agency, the New Jersey State Historic Preservation Officer, the New Jersey State Office of Emergency

Management, the Advisory Council on Historic Preservation, the Absentee Shawnee Tribe of Indians of Oklahoma, the Delaware Nation, the Delaware Tribe of Indians, the Shawnee Tribe of Oklahoma, and the Stockbridge Munsee Band of Mohicans, as signed onto by the New Jersey Department of Community Affairs.

4. In the event that archeological deposits, including any Native American pottery, stone tools, bones, or human remains, are uncovered, the project shall be halted and the applicant shall stop all work immediately in the vicinity of the discovery and take reasonable measures to avoid or minimize harm to the finds. All archeological findings will be secured and access to the sensitive area restricted. The applicant will inform FEMA immediately and FEMA will consult with the State Historic Preservation Office (SHPO) or Tribal Historic Preservation Office (THPO) and Tribes and work in sensitive areas cannot resume until consultation is completed and appropriate measures have been taken to ensure that the project is in compliance with the National Historic Preservation Act (NHPA).

Noise

5. During the temporary construction activities, outfit all equipment with operating mufflers.
6. During the temporary construction activities, comply with the applicable local noise ordinance.

Air Quality

Project activities must meet the regulatory requirements of New Jersey's Air Rules and Air Pollution Controls requirements (see LRRP Camden County_AirQualityMemo). In addition, the following must be met:

7. Use water or chemical dust suppressant in exposed areas to control dust.
8. Cover the load compartments of trucks hauling dust-generating materials.
9. Wash heavy trucks and construction vehicles before they leave the site.
10. Reduce vehicle speed on non-paved areas and keep paved areas clean.
11. Retrofit older equipment with pollution controls.
12. Establish and follow specified procedures for managing contaminated materials discovered or generated during construction.
13. Employ spill mitigation measures immediately upon a spill of fuel or other hazardous material.
14. Obtain an air pollution control permit to construct and a certificate to operate for all equipment subject to N.J.A.C. 7:27-8.2(c). Such equipment includes, but is not limited to, the following:
 - e. Any commercial fuel combustion equipment rated with a maximum heat input of 1,000,000 British Thermal Units per hour or greater to the burning chamber (N.J.A.C. 7:27-8.2(c)1);
 - f. Any stationary storage tank for volatile organic compounds with a capacity of 2,000 gallons and a vapor pressure of 0.02 pounds per square inch or greater (N.J.A.C. 7:27-8.2(c)9);
 - g. Any tank, reservoir, container, or bin with capacity in excess of 2,000 cubic feet used for storage of solid particles (N.J.A.C. 7:27-8.2(c)10); and
 - h. Any stationary reciprocating engine with a maximum rated power output of 37 kW or greater, used for generating electricity, not including emergency generators (N.J.A.C. 7:27-8.2(c)21).(Note: One or two family dwellings and dwellings of six or less family units, one of which is owner occupied, are exempt pursuant to NJSA 26:2C-9.2.)
15. Minimize idling and ensure that all on-road vehicles and non-road construction equipment operated at or visiting the project site comply with the applicable smoke and "3-minute idling" limits (N.J.A.C. 7:27-14.3, 14.4, 15.3 and 15.8).
16. Ensure that all diesel on-road vehicles and non-road construction equipment used on or visiting the project site use ultra-low sulfur fuel (<15 ppm sulfur) in accordance with the federal Non-road Diesel Rule (40 CFR Parts 9, 69, 80, 86, 89, 94, 1039, 1051, 1065, 1068).

17. Operate, if possible, newer on-road diesel vehicles and non-road construction equipment equipped with tier 4 engines, or equipment equipped with an exhaust retrofit device.

Erosion and Drainage/Storm Water Runoff

18. Implement and maintain erosion and sedimentation control measures.
19. Minimize soil compaction by minimizing project activities in vegetated areas, including lawns.

Transportation and Accessibility

20. Implement and maintain appropriate traffic control and access maintenance measures.

Hazardous Materials and Solid Waste Disposal/Recycling

21. All activities must comply with applicable federal, state, and local laws and regulations regarding asbestos, including but not limited to the following:
 - e. National Emission Standard for Asbestos, standard for demolition and renovation, 40 CFR 61.145
 - f. National Emission Standard for Asbestos, standard for waste disposal for manufacturing, fabricating, demolition, and spraying operations, 40 CFR 61.150
 - g. NJAC 7:26-2.12—Generator requirements for disposal of asbestos containing waste materials
 - h. New Jersey Asbestos Control and Licensing Act, N.J.S.A. 34:5A-32 et seq.
22. Applicant must comply with all laws and regulations concerning the proper handling, removal and disposal of hazardous materials (e.g. asbestos, lead-based paint) or household waste (e.g. construction and demolition debris, pesticides/herbicides, white goods).
23. All activities must comply with applicable federal, state, and local laws and regulations regarding lead-based paint, including but not limited to HUD's lead-based paint regulations in 24 CFR Part 35 Subparts B, H, and J.
24. All residential structures must be free of mold attributable to Superstorm Sandy.
25. Comply with all laws, regulations, and industry standards applicable to aboveground and underground storage tanks, including the New Jersey underground storage tank regulations at NJAC 7:14B.

Sole Source Aquifers

26. Impervious surface coverage must not increase by more than 75% on any of the proposed activity sites.