

## NOTICE OF INTENT TO REQUEST RELEASE OF FUNDS

1/28/2025

*City of Grand Haven  
Attn: Ashley Latsch, City Manager  
519 Washington Avenue  
Grand Haven, Michigan, 49417  
(616) 502-4502*

*Young Men's Christian Association Tri-Cities  
Attn: Greg Coil, Chief Executive Officer  
1 Y Drive  
Grand Haven, Michigan, 49417  
616-842-7051 ext. 222*

On or about February 5, 2025 the City of Grand Haven will authorize the Young Men's Christian Association Tri-Cities to submit a request to the HUD for the release of Community Project Funding funds under the Consolidated Appropriations Act, 2024 P.L. (118-42), to undertake a project known as Tri-Cities YMCA- Building for Our Future Capital Improvement for the purpose of renovation and upgrades to the Tri-Cities Family YMCA building (1 Y Drive, Grand Haven, MI). Project activities include: non-structural demolition (remove all finishes, flooring, ceilings, fixtures, millwork, lighting, equipment, etc.) in areas on the first and second floors, ADA updates to restrooms and locker rooms, mother's room in family locker room, conversion of the five racquetball courts into a gymnastic arena, gymnasium improvements and childcare wing improvements, removal and replacement of a fence and signage at the NW corner of the building, removal and replacement of storage sheds and concrete pads east of the south entrance, removal of mechanical equipment at the northeast corner of the building, and the relocation of a gas service line to the northeast corner of the building. Project funds include \$1,000,000 of US HUD Community Project Funds, a \$3,000,000 Michigan Department of Labor and Economic Opportunity grant, \$3,500,000 of private donors and community fundraising of \$2,500,000; total project costs are estimated at \$10,000,000.

The activities proposed are categorically excluded under HUD regulations at 24 CFR Part 58 from National Environmental Policy Act (NEPA) requirements. An Environmental Review Record (ERR) that documents the environmental determinations for this project is on file at the City Clerk's office in the Grand Haven City Hall, 519 Washington Avenue, Grand Haven, MI 49417 and may be examined or copied weekdays 8 A.M to 5 P.M.

### **PUBLIC COMMENTS**

Any individual, group, or agency may submit written comments on the ERR to the City Manager's Office in the Grand Haven City Hall (519 Washington Avenue, Grand Haven) or by email to the city manager at [alatsch@grandhaven.org](mailto:alatsch@grandhaven.org). All comments received by February 4, 2025 will be considered by the City of Grand Haven prior to authorizing submission of a request for release of funds.

### **ENVIRONMENTAL CERTIFICATION**

The City of Grand Haven certifies to HUD that Bob Monetza in his capacity as Mayor consents to accept the jurisdiction of the Federal Courts if an action is brought to enforce responsibilities in relation to the environmental review process and that these responsibilities have been satisfied. HUD's approval of the certification satisfies its responsibilities under NEPA and related laws and authorities and allows Young Men's Christian Association Tri-Cities to use Program funds.

## **OBJECTIONS TO RELEASE OF FUNDS**

HUD will consider objections to its release of funds and the City of Grand Haven's certification received by February 5, 2025 or for a period of fifteen days following its actual receipt of the request (whichever is later) only if they are on one of the following bases: (a) the certification was not executed by the Certifying Officer of the City of Grand Haven; (b) the City of Grand Haven has omitted a step or failed to make a decision or finding required by HUD regulations at 24 CFR part 58; (c) the grant recipient or other participants in the development process have committed funds, incurred costs or undertaken activities not authorized by 24 CFR Part 58 before approval of a release of funds by HUD; or (d) another Federal agency acting pursuant to 40 CFR Part 1504 has submitted a written finding that the project is unsatisfactory from the standpoint of environmental quality. Objections must be prepared and submitted in accordance with the required procedures (24 CFR Part 58, Sec. 58.76) and shall be addressed to U. S. Department of Housing and Urban Development –Detroit Field Office, Keith E. Hernandez, Director, Community Planning and Development at 477 Michigan Ave, Suite 1600, Detroit, MI 48226 or [DetroitCPD@hud.gov](mailto:DetroitCPD@hud.gov). Potential objectors should contact HUD to verify the actual last day of the objection period.

Bob Monetza, Mayor





U.S. Department of Housing and Urban  
Development  
451 Seventh Street, SW  
Washington, DC 20410  
[www.hud.gov](http://www.hud.gov)  
[espanol.hud.gov](http://espanol.hud.gov)

**Environmental Review for Activity/Project that is  
Categorically Excluded Subject to Section 58.5  
Pursuant to 24 CFR 58.35(a)**

**Project Information**

**Project Name:** Tri-Cities-YMCA--Building-for-Our-Future-Capital-Improvement

**HEROS Number:** 900000010445929

**Start Date:** 01/02/2025

**State / Local Identifier:** Grand Haven, Michigan

**Project Location:** 1 Y Dr, Grand Haven, MI 49417

**Additional Location Information:**

N/A

**Description of the Proposed Project [24 CFR 50.12 & 58.32; 40 CFR 1508.25]:**

The proposed Tri-Cities Family YMCA Project will result in renovation and upgrades to the Tri-Cities Family YMCA building which was built in 1974. Proposed project activities include mechanical and operational upgrades, structural improvements, expansion of indoor track, renovation of locker rooms and bathrooms to ADA standards, and renovation of the building's roof. The following interior improvements are proposed for the Tri-city YMCA building: - First floor improvements o Full non-structural demolition (remove all finishes, flooring, ceilings, fixtures, millwork, lighting, equipment, etc.) in the following areas: weightroom, locker rooms, office spaces, pool, corridors and kid's world. o ADA updates to restrooms and locker rooms (ADA sinks and grab bars) o Mother's room in family locker room o The five racquetball courts to be demolished and converted into gymnastic arena - Second floor improvements o Full non-structural demolition (remove all finishes, flooring, ceilings, fixtures, millwork, lighting, equipment, etc.) in the following areas: childcare rooms A - C, corridors, offices, bathrooms, reception/entry area, gymnasium. o Gymnasium improvements: expanded and elevated track around perimeter, viewing area of new gymnastic arena on first floor, new workout equipment, bouldering wall, and full height operable dividers. o Child care wing improvements: New child care room D, updated bathrooms, new connecting room for rooms C and D, new bathrooms and storage between rooms C and D. The following exterior improvements are proposed for the Tri-city YMCA property: - The removal and replacement of a fence and some signage at the NW corner of the building, - The removal and replacement of storage sheds and concrete pads east of the south entrance, - The removal of a tree and mechanical equipment at the NE corner of the building, and - The relocation of a gas service line to the NE corner of the building. The project includes rehabilitation of a building that serves the community and installation of design features and infrastructure upgrades to improve energy efficiency. This project will also improve the mobility and accessibility of elderly and handicapped persons throughout the facility

**Level of Environment Review Determination:**

Categorically Excluded per 24 CFR 58.35(a), and subject to laws and authorities at §58.5: 58.35(a)(3)(iii)

**Funding Information**

Grant Number	HUD Program	Program Name	
B-24-CP-MI-1154	Community Planning and Development (CPD)	Community Project Funding (CPF) Grants	\$1,000,000.00
NA	Other	Michigan Department of Labor and Economic Opportunity - Community Enhancement Grant	\$3,000,000.00

**Estimated Total HUD Funded Amount:** \$1,000,000.00

**Estimated Total Project Cost [24 CFR 58.2 (a) (5)]:** \$10,000,000.00

**Mitigation Measures and Conditions [CFR 1505.2(c)]:**

Summarized below are all mitigation measures adopted by the Responsible Entity to reduce, avoid or eliminate adverse environmental impacts and to avoid non-compliance or non-conformance with the above-listed authorities and factors. These measures/conditions must be incorporated into project contracts, development agreements and other relevant documents. The staff responsible for implementing and monitoring mitigation measures should be clearly identified in the mitigation plan.

Law, Authority, or Factor	Mitigation Measure or Condition	Comments on Completed Measures	Complete
Contamination and Toxic Substances	Based on Triterra's understanding of the renovation activities planned for the Property, proper abatement of the asbestos-containing materials is required if they may be disturbed (broken, cut, drilled, abraded, ground, sanded, etc.) during such activities. All abatement/demolition activities should take into consideration that paints containing lead and chromium may be present, and therefore lead-safe work practices should be utilized throughout the abatement and demolition process to prevent employee exposure. Contractors performing demolition activities must have up-to-date lead awareness training prior to	N/A	

	<p>performing any work-related activities. Triterra strongly recommends an Abatement Specification be assembled to address the ACM identified within the building. The purpose of this document is to specify incidental procedures and equipment required to protect workers from contact with airborne asbestos fibers and ensure that all ACM is properly abated prior to the scheduled demolition. This document identifies Contractor requirements for submittals, State notification, waste disposal, employee qualification, air monitoring, etc. Depending on the type and quantities of ACM that will be removed from the structure, a notification may need to be provided to the following regulatory agencies 10 working (or calendar) days prior to the commencement of work with the submittal of a Notification of Intent to Renovate/Demolish form (EQP5661). The retained asbestos abatement contractor should complete this form as part of their services. This notification should be provided to the Michigan Department of Environment, Great Lakes, and Energy - Air Quality Division (EGLE-AQD) and the Michigan Department of Labor and Economic Opportunity (LEO) any time renovation/demolition/asbestos abatement is to be completed on a building.</p>		
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**Determination:**

<input type="checkbox"/>	<p>This categorically excluded activity/project converts to <b>EXEMPT</b> 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; <b>Funds may be committed and drawn down after certification of this part</b> for this (now) EXEMPT project; OR</p>
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<input checked="" type="checkbox"/>	This categorically excluded activity/project cannot convert to Exempt status because one or more statutes or authorities listed at Section 58.5 requires formal consultation or mitigation. Complete consultation/mitigation protocol requirements, <b>publish NOI/RROF and obtain "Authority to Use Grant Funds"</b> (HUD 7015.16) per Section 58.70 and 58.71 before committing or drawing down any funds; OR
<input type="checkbox"/>	This project is not categorically excluded OR, if originally categorically excluded, is now subject to a full Environmental Assessment according to Part 58 Subpart E due to extraordinary circumstances (Section 58.35(c)).

Preparer Signature: Jessica Meister Date: 1/27/2025

Name / Title/ Organization: Jessica Meister / / City of Grand Haven

Responsible Entity Agency Official Signature: [Signature] Date: 1-27-25

Name/ Title: MAYOR, City of GRAND HAVEN

This original, signed document and related supporting material must be retained on file by the Responsible Entity in an Environment Review Record (ERR) for the activity / project (ref: 24 CFR Part 58.38) and in accordance with recordkeeping requirements for the HUD program(s).





**Environmental Review for Activity/Project that is  
Categorically Excluded Subject to Section 58.5  
Pursuant to 24 CFR 58.35(a)**

**Project Information**

**Project Name:** Tri-Cities-YMCA--Building-for-Our-Future-Capital-Improvement

**HEROS Number:** 900000010445929

**Start Date:** 01/02/2025

**Responsible Entity (RE):** City of Grand Haven, 519 Washington Avenue Grand Haven  
MI, 49417

**State / Local Identifier:** Grand Haven, Michigan

**RE Preparer:** Jessica Meister

**Certifying Officer** Bob Monetza  
**r:**

**Grant Recipient (if different than Responsible Entity):** Young Men's Christian Association Tri-  
cities

**Point of Contact:** Greg Coil

**Point of Contact:** Jessica Meister  
**Consultant (if applicable):** Triterra

40 CFR 1506.5(b)(4): The lead agency or, where appropriate, a cooperating agency shall prepare a disclosure statement for the contractor's execution specifying that the contractor has no financial or other interest in the outcome of the action. Such statement need not include privileged or confidential trade secrets or other confidential business information.

- ✓ By checking this box, I attest that as a preparer, I have no financial or other interest in the outcome of the undertaking assessed in this environmental review.

**Project Location:** 1 Y Dr, Grand Haven, MI 49417

**Additional Location Information:**

N/A

**Direct Comments to:** alatsch@grandhaven.org

519 Washington Avenue  
Grand Haven, MI 49417

**Description of the Proposed Project [24 CFR 50.12 & 58.32; 40 CFR 1508.25]:**

The proposed Tri-Cities Family YMCA Project will result in renovation and upgrades to the Tri-Cities Family YMCA building which was built in 1974. Proposed project activities include mechanical and operational upgrades, structural improvements, expansion of indoor track, renovation of locker rooms and bathrooms to ADA standards, and renovation of the building's roof. The following interior improvements are proposed for the Tri-city YMCA building: - First floor improvements o Full non-structural demolition (remove all finishes, flooring, ceilings, fixtures, millwork, lighting, equipment, etc.) in the following areas: weightroom, locker rooms, office spaces, pool, corridors and kid's world. o ADA updates to restrooms and locker rooms (ADA sinks and grab bars) o Mother's room in family locker room o The five racquetball courts to be demolished and converted into gymnastic arena - Second floor improvements o Full non-structural demolition (remove all finishes, flooring, ceilings, fixtures, millwork, lighting, equipment, etc.) in the following areas: childcare rooms A - C, corridors, offices, bathrooms, reception/entry area, gymnasium. o Gymnasium improvements: expanded and elevated track around perimeter, viewing area of new gymnastic arena on first floor, new workout equipment, bouldering wall, and full height operable dividers. o Child care wing improvements: New child care room D, updated bathrooms, new connecting room for rooms C and D, new bathrooms and storage between rooms C and D. The following exterior improvements are proposed for the Tri-city YMCA property: - The removal and replacement of a fence and some signage at the NW corner of the building, - The removal and replacement of storage sheds and concrete pads east of the south entrance, - The removal of a tree and mechanical equipment at the NE corner of the building, and - The relocation of a gas service line to the NE corner of the building. The project includes rehabilitation of a building that serves the community and installation of design features and infrastructure upgrades to improve energy efficiency. This project will also improve the mobility and accessibility of elderly and handicapped persons throughout the facility

**Maps, photographs, and other documentation of project location and description:**

[OAISD Support.pdf](#)

[City Letter of Support TCFYMCA.pdf](#)

[Chamber of Commerce Support.pdf](#)

[Village of SL letter of support.pdf](#)

[TCYMCA Letter of Support GHACF.pdf](#)

[TCFYMCA Support - SL Township.pdf](#)

[TCFYMCA Letter of Support - GHAPS.pdf](#)

[SLPS Support.pdf](#)

[Scholten FY24 CPF Request Form Answers - FINAL.pdf](#)

[2025 01 10 TCFY For Bids Issuance Combined Set.pdf](#)

[Figure1.pdf](#)

[Figure 2.pdf](#)

[Site Photos.pdf](#)

**Level of Environmental Review Determination:**

**Categorically Excluded per 24 CFR 58.35(a), and subject to laws and authorities at 58.5:**

**Determination:**

	This categorically excluded activity/project converts to <b>EXEMPT</b> 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; <b>Funds may be committed and drawn down after certification of this part</b> for this (now) EXEMPT project; OR
✓	This categorically excluded activity/project cannot convert to Exempt status because one or more statutes or authorities listed at Section 58.5 requires formal consultation or mitigation. Complete consultation/mitigation protocol requirements, <b>publish NOI/RROF and obtain "Authority to Use Grant Funds"</b> (HUD 7015.16) per Section 58.70 and 58.71 before committing or drawing down any funds; OR
	This project is not categorically excluded OR, if originally categorically excluded, is now subject to a full Environmental Assessment according to Part 58 Subpart E due to extraordinary circumstances (Section 58.35(c)).

**Approval Documents:**

[Executed Document.pdf](#)

**7015.15 certified by Certifying Officer  
on:**

**7015.16 certified by Authorizing Officer  
on:**

**Funding Information**

Grant / Project Identification Number	HUD Program	Program Name	Funding Amount
B-24-CP-MI-1154	Community Planning and Development (CPD)	Community Project Funding (CPF) Grants	\$1,000,000.00
NA	Other	Michigan Department of Labor and Economic Opportunity - Community Enhancement Grant	\$3,000,000.00

**Estimated Total HUD Funded, Assisted or Insured Amount:** \$1,000,000.00

**Estimated Total Project Cost:** \$10,000,000.00

**Compliance with 24 CFR §50.4, §58.5 and §58.6 Laws and Authorities**

<b>Compliance Factors:</b> Statutes, Executive Orders, and Regulations listed at 24 CFR §50.4, §58.5, and §58.6	Are formal compliance steps or mitigation required?	Compliance determination (See Appendix A for source determinations)
<b>STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR §50.4 &amp; § 58.6</b>		
<b>Airport Hazards</b> Clear Zones and Accident Potential Zones; 24 CFR Part 51 Subpart D	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	The project site is not within 15,000 feet of a military airport or 2,500 feet of a civilian airport. The project is in compliance with Airport Hazards requirements.
<b>Coastal Barrier Resources Act</b> Coastal Barrier Resources Act, as amended by the Coastal Barrier Improvement Act of 1990 [16 USC 3501]	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	This project is not located in a CBRS Unit. Therefore, this project has no potential to impact a CBRS Unit and is in compliance with the Coastal Barrier Resources Act.

<p><b>Flood Insurance</b> Flood Disaster Protection Act of 1973 and National Flood Insurance Reform Act of 1994 [42 USC 4001-4128 and 42 USC 5154a]</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>According to FEMA map 26139C0086F (effective 10/21/2021), The project is not located in a FEMA-designated Special Flood Hazard Area. The City of Grand Haven is a participant in good standing with the National Flood Insurance program (NFIP). The project is in compliance with flood insurance requirements.</p>
<p><b>STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR §50.4 &amp; § 58.5</b></p>		
<p><b>Air Quality</b> Clean Air Act, as amended, particularly section 176(c) &amp; (d); 40 CFR Parts 6, 51, 93</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>According to NEPAassist, the proposed project site is not within a one-mile radius of air quality non-attainment areas for O<sub>3</sub> 8hr, lead, SO<sub>2</sub> 1hr, PM<sub>2.5</sub> 24hr, PM 2.5 annual, PM 10, CO, or NO<sub>2</sub>. According to the 2023 EGLE NAAQS map, Ottawa county does not contain any non-attainment areas. The project is in compliance with the Clean Air Act.</p>
<p><b>Coastal Zone Management Act</b> Coastal Zone Management Act, sections 307(c) &amp; (d)</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p>Triterra queried the MSHDA and EGLE Coastal Zone Management Boundary Maps. The project is within a Coastal Zone Management Area. According to the June 28, 2024, letter from Matt Smar, the Federal Consistency Specialist of EGLE, the project is in consistency with the CZM Act provided all required permits are issued and complied with. The project is occurring in a heavily urbanized area and does not impact wetlands or other coastal elements. The project is in compliance with the Coastal Zone Management Act.</p>
<p><b>Contamination and Toxic Substances</b> 24 CFR 50.3(i) &amp; 58.5(i)(2)]</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p>Contamination On July 15, 2024 Triterra reviewed environmental and historical records, and reviewed local physiographic, geologic, and hydrologic information to determine historical and current land ownership and use, physical setting, and identify potential environmental conditions associated with the subject property. The following records and data sources were</p>

		<p>searched, and the pertinent findings are provided below. Topographic Maps (1930-2018) Google Earth Pro Historical Satellite Images (1980-2023) Michigan Department of Environment, Great Lakes and Energy - RIDE Mapper Michigan Department of Environment, Great Lakes, and Energy - Remediation Information Data Exchange (RIDE) Michigan Department of Environment, Great Lakes and Energy MiEnviro Portal Michigan Department of Environment, Great Lakes, and Energy - Historic and Active Dry Cleaning Lists United States Environmental Protection Agency NEPAassist Based on the property's topographic position and distance from sites of environmental concern, it is Triterra's opinion that the proposed project location is unlikely to have significant environmental concerns.</p> <p>Radon According to the CDC Environmental Public Health Tracking Network map for Ottawa County, the annual mean pre-mitigation radon measurement in tested buildings for the most recent 10-year period is 2.5 pCi/L. There is no other available evidence of radon levels in the area. Since the data indicates the average radon levels in Ottawa county are less than 4.0 pCi/L, no further action is required at this time.</p> <p>Lead AAA Lead Inspections, Inc. (AAA) completed a Lead Risk Assessment Report for the Child Development Program areas of the Property building on July 29, 2016. According to the report, no lead-based paint hazards were identified within these areas.</p> <p>Asbestos On November 4, 2024 Materials Testing Consultants performed an Asbestos Materials Survey for the building located at 1 Y Drive, Grand Haven, Michigan. According to the report the Friable asbestos</p>
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	<p>containing materials (ACM) were identified during the inspection (HM 22) and non-friable ACM were identified (HM 2, HM 13, HM 27, HM 32, HM 39, HM 53, HM 55, HM 58, HM 94, HM 119, HM 128, and HM 130). Additional materials were not tested and assumed to be asbestos containing materials (See attached report for additional information). Based on Triterra's understanding of the renovation activities planned for the Property, proper abatement of the asbestos-containing materials is required if they may be disturbed during such activities. All abatement/demolition activities should take into consideration that paints containing lead and chromium may be present, therefore lead-safe work practices should be utilized throughout the abatement/demolition process to prevent employee exposure. Contractors performing demolition activities must have up-to-date lead awareness training prior to performing any work-related activities. Triterra recommends an Abatement Specification be assembled to address the ACM identified within the building. The purpose of this document is to specify incidental procedures and equipment required to protect workers from contact with airborne asbestos fibers and ensure that all ACM is properly abated prior to the scheduled demolition. Depending on the type and quantities of ACM that will be removed from the structure, a notification may need to be provided to the following regulatory agencies 10 working (or calendar) days prior to the commencement of work with the submittal of a Notification of Intent to Renovate/Demolish form (EQP5661). The retained asbestos abatement</p>
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		<p>contractor should complete this form as part of their services. This notification should be provided to EGLE-AQD and the Michigan Department of Labor and Economic Opportunity (LEO) any time renovation/demolition/asbestos abatement is to be completed on a building.</p>
<p><b>Endangered Species Act</b> Endangered Species Act of 1973, particularly section 7; 50 CFR Part 402</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>According to the USFWS iPac official species list (January 6, 2025), the following threatened and endangered species are listed for Ottawa County: Myotis sodalis (Indiana Bat [IBat]), Charadrius melodus (Piping Plover), Calidris canutus rufe (Rufa Red Knot), Sistrurus catenatus (Eastern Massasauga Rattlesnake [EMR]), and Cirsium pitcheri (Pitchers Thistle). The subject property does not contain suitable habitat for the listed threatened or endangered species for Ottawa County. The proposed project activities consist of the rehabilitation of an existing building in a developed lot with manicured lawns, a parking lot, scattered trees and shrubs in an established residential and commercial corridor. The project area is not likely to contain any critical habitats. Consultation with the U.S. Fish and Wildlife Service or the State of Michigan Department of Natural Resources is not required. This project is in compliance with the Endangered Species Act.</p>
<p><b>Explosive and Flammable Hazards</b> Above-Ground Tanks)[24 CFR Part 51 Subpart C</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>The proposed project does not include the development of a hazardous facility (a facility that mainly stores, handles or processes flammable or combustible chemicals such as bulk fuel storage facilities and refineries) OR the development, construction, rehabilitation that will increase residential densities, or conversion. The</p>



		proposed project is in compliance with this section.
<p><b>Farmlands Protection</b> Farmland Protection Policy Act of 1981, particularly sections 1504(b) and 1541; 7 CFR Part 658</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<p>This project does not include any activities that could potentially convert agricultural land to a non-agricultural use. The project is in compliance with the Farmland Protection Policy Act.</p>
<p><b>Floodplain Management</b> Executive Order 11988, particularly section 2(a); 24 CFR Part 55</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<p>According to the National Flood Hazard Layer FIRMette map, Map Panel Number 26139C0086F (effective 10/21/2021) the proposed project is located in an area of minimal chance flood hazard (Zone X Floodplain). On 6/24/2024 Triterra utilized the Federal Flood Standard Support Tool Beta V1.1.5 which generated a Freeboard Value Approach report. According to the report, the proposed project is not located within the FFRMS (Federal Flood Risk Management Standard) floodplain. Additionally, Triterra utilized the USGS elevation query system to confirm that the proposed project location is greater than 2-feet above the 100-year base floodplain elevation (BFE); the project elevation is approximately 620 feet while the 100-year BFE is 583 feet. Therefore, the proposed project is not within the FFRMS and is in compliance with 24 CFR 55. This project does not occur in the FFRMS floodplain. The project is in compliance with Executive Orders 11988 and 13690.</p>
<p><b>Historic Preservation</b> National Historic Preservation Act of 1966, particularly sections 106 and 110; 36 CFR Part 800</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<p>State Historic Preservation Office/Section 106 On December 12, 2024, a section 106 Application was completed and submitted for the Proposed Project area by Ashley Latsch of The City of Grand Haven. According to a letter dated January 2, 2025, the State of Michigan - State Historic Preservation Office (SHPO) determined that the effects of the proposed undertaking do not meet the criteria of</p>

		<p>adverse effect. Therefore, the project will have no adverse effect on historic properties within the area of the proposed project area. Tribal Historic Preservation Officer (THPO) Consultation Triterra utilized the US Department of Housing and Urban Development Tribal Directory Assessment Tool (TDAT) to identify Native American Nations associated with Ottawa County. The City of Grand Haven (the RE) sent notices of intent for the Proposed Project to all identified Nations on July 15, 2024 via email: Lac Vieux Desert Band of Lake Superior Chippewa Indians of Michigan Little River Band of Ottawa Indians, MI Little Traverse Bay Bands of Odawa Indians, MI Menominee Indian Tribe of Wisconsin Miami Tribe of Oklahoma Ottawa Tribe of Oklahoma Red Lake Band of Chippewa Indians, MN Sault Ste. Marie Tribe of Chippewa Indians, MI No responses have been received by the RE as of the date of the report.</p>
<p><b>Noise Abatement and Control</b> Noise Control Act of 1972, as amended by the Quiet Communities Act of 1978; 24 CFR Part 51 Subpart B</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>The proposed project does not include new construction for residential use, rehabilitation of an existing residential property, or a research demonstration project which does not result new construction or reconstruction, interstate, land sales registration, or any timely emergency assistance under disaster assistance provisions or appropriations which are provided to save lives, protect property, protect public health and safety, remove debris and wreckage, or assistance that has the effect of restoring facilities substantially as they existed prior to the disaster. The project is in compliance with HUD's Noise regulation.</p>
<p><b>Sole Source Aquifers</b> Safe Drinking Water Act of 1974, as</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>Based on the project description, the project consists of activities that are</p>

<p>amended, particularly section 1424(e); 40 CFR Part 149</p>		<p>unlikely to have an adverse impact on groundwater resources. Additionally, according to EPA Region V, no designated Sole Source Aquifers are located in the area of the project site or Michigan. Therefore, the proposed project is in compliance with 40 CFR Part 149.</p>
<p><b>Wetlands Protection</b> Executive Order 11990, particularly sections 2 and 5</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>The proposed project location is a 2.32-acre of developed land with one commercial building, paved parking lot, and landscaping. Triterra reviewed the USFWS Wetland Mapper, EGLE Wetlands Map Viewer, historical topography, NRCS web soil survey, and a review of historical aerials and no suspect wetlands were identified on the property. The project is in compliance with Executive Order 11990.</p>
<p><b>Wild and Scenic Rivers Act</b> Wild and Scenic Rivers Act of 1968, particularly section 7(b) and (c)</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>This project is not within proximity of a NWSRS river, a current study river, or an NRI listed river. The project is in compliance with the Wild and Scenic Rivers Act.</p>
<p><b>HUD HOUSING ENVIRONMENTAL STANDARDS</b></p>		
<p><b>ENVIRONMENTAL JUSTICE</b></p>		
<p><b>Environmental Justice</b> Executive Order 12898</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>According to the USEPA EJ Screen, within a one-mile radius of the proposed project site, approximately 7% of the population identifies as People of Color, 5% of the population is considered unemployed and 22% of the population are considered low-income. The proposed project consists of the construction of two additions and multiple renovations on the current YMCA building. One addition will be utilized as a child care facility that will increase the availability of affordable childcare spots at the YMCA. Also, the mechanical, operational, and structural improvements are required to ensure the long-term sustainability of the</p>

		<p>facility. The proposed improvements will implement Universal Design principles to make the entire YMCA accessible to those with limited mobility. No adverse environmental impacts were identified for the property that are disproportionately high for low-income and/or minority communities in the area. According to the EGLE EJ Screen (Draft) tool, the project area is located in an area with a MiEJ Score 47 percentile. The project is in compliance with Executive Order 12898.</p>
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**Mitigation Measures and Conditions [40 CFR 1505.2(c)]:**

Summarized below are all mitigation measures adopted by the Responsible Entity to reduce, avoid or eliminate adverse environmental impacts and to avoid non-compliance or non-conformance with the above-listed authorities and factors. These measures/conditions must be incorporated into project contracts, development agreements and other relevant documents. The staff responsible for implementing and monitoring mitigation measures should be clearly identified in the mitigation plan.

<b>Law, Authority, or Factor</b>	<b>Mitigation Measure or Condition</b>	<b>Comments on Completed Measures</b>	<b>Mitigation Plan</b>	<b>Complete</b>
Contamination and Toxic Substances	Based on Triterra's understanding of the renovation activities planned for the Property, proper abatement of the asbestos-containing materials is required if they may be disturbed (broken, cut, drilled, abraded, ground, sanded, etc.) during such activities. All abatement/demolition activities should take into consideration that paints containing lead and chromium may be present, and therefore lead-safe work practices should be utilized throughout the abatement and demolition	N/A		

	<p>process to prevent employee exposure. Contractors performing demolition activities must have up-to-date lead awareness training prior to performing any work-related activities.</p> <p>Triterra strongly recommends an Abatement Specification be assembled to address the ACM identified within the building. The purpose of this document is to specify incidental procedures and equipment required to protect workers from contact with airborne asbestos fibers and ensure that all ACM is properly abated prior to the scheduled demolition. This document identifies Contractor requirements for submittals, State notification, waste disposal, employee qualification, air monitoring, etc. Depending on the type and quantities of ACM that will be removed from the structure, a notification may need to be provided to the following regulatory agencies 10 working (or calendar) days prior to the commencement of work with the submittal of a Notification of Intent to Renovate/Demolish form (EQP5661). The retained asbestos abatement contractor should complete this form as part of their services. This notification should be provided to the Michigan Department of Environment, Great Lakes, and Energy - Air Quality Division (EGLE-AQD) and the Michigan Department of Labor and Economic Opportunity (LEO) any</p>			
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	time renovation/demolition/asbestos abatement is to be completed on a building.			
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**Project Mitigation Plan**

Based on Triterra's understanding of the renovation activities planned for the Property, proper abatement of the asbestos-containing materials is required if they may be disturbed (broken, cut, drilled, abraded, ground, sanded, etc.) during such activities. All abatement/ demolition activities should take into consideration that paints containing lead and chromium may be present, and therefore lead-safe work practices should be utilized throughout the abatement and demolition process to prevent employee exposure. Contractors performing demolition activities must have up-to-date lead awareness training prior to performing any work-related activities.

**Supporting documentation on completed measures**

## APPENDIX A: Related Federal Laws and Authorities

### Airport Hazards

General policy	Legislation	Regulation
It is HUD's policy to apply standards to prevent incompatible development around civil airports and military airfields.		24 CFR Part 51 Subpart D

1. To ensure compatible land use development, you must determine your site's proximity to civil and military airports. Is your project within 15,000 feet of a military airport or 2,500 feet of a civilian airport?

✓ No

Based on the response, the review is in compliance with this section. Document and upload the map showing that the site is not within the applicable distances to a military or civilian airport below

Yes

### Screen Summary

#### Compliance Determination

The project site is not within 15,000 feet of a military airport or 2,500 feet of a civilian airport. The project is in compliance with Airport Hazards requirements.

#### Supporting documentation

[Airport Distances from Project.pdf](#)

Are formal compliance steps or mitigation required?

Yes

✓ No

## Coastal Barrier Resources

General requirements	Legislation	Regulation
HUD financial assistance may not be used for most activities in units of the Coastal Barrier Resources System (CBRS). See 16 USC 3504 for limitations on federal expenditures affecting the CBRS.	Coastal Barrier Resources Act (CBRA) of 1982, as amended by the Coastal Barrier Improvement Act of 1990 (16 USC 3501)	

**1. Is the project located in a CBRS Unit?**

No

Document and upload map and documentation below.

Yes

### Screen Summary

#### **Compliance Determination**

This project is not located in a CBRS Unit. Therefore, this project has no potential to impact a CBRS Unit and is in compliance with the Coastal Barrier Resources Act.

#### **Supporting documentation**

[CBRS Map\(1\).pdf](#)

[CBRS Map.png](#)

#### **Are formal compliance steps or mitigation required?**

Yes

No



## Flood Insurance

General requirements	Legislation	Regulation
Certain types of federal financial assistance may not be used in floodplains unless the community participates in National Flood Insurance Program and flood insurance is both obtained and maintained.	Flood Disaster Protection Act of 1973 as amended (42 USC 4001-4128)	24 CFR 50.4(b)(1) and 24 CFR 58.6(a) and (b); 24 CFR 55.1(b).

**1. Does this project involve financial assistance for construction, rehabilitation, or acquisition of a mobile home, building, or insurable personal property?**

No. This project does not require flood insurance or is excepted from flood insurance.

✓ Yes

**2. Upload a FEMA/FIRM map showing the site here:**

[FIRMETTE ae719555-7322-4956-8ae0-e0828ae85240.pdf](#)

The Federal Emergency Management Agency (FEMA) designates floodplains. The [FEMA Map Service Center](#) provides this information in the form of FEMA Flood Insurance Rate Maps (FIRMs). For projects in areas not mapped by FEMA, use the best available information to determine floodplain information. Include documentation, including a discussion of why this is the best available information for the site. Provide FEMA/FIRM floodplain zone designation, panel number, and date within your documentation.

**Is the structure, part of the structure, or insurable property located in a FEMA-designated Special Flood Hazard Area?**

✓ No

Based on the response, the review is in compliance with this section.

Yes

**4. While flood insurance is not mandatory for this project, HUD strongly recommends**

**that all insurable structures maintain flood insurance under the National Flood Insurance Program (NFIP). Will flood insurance be required as a mitigation measure or condition?**

Yes

✓ No

**Screen Summary**

**Compliance Determination**

According to FEMA map 26139C0086F (effective 10/21/2021), The project is not located in a FEMA-designated Special Flood Hazard Area. The City of Grand Haven is a participant in good standing with the National Flood Insurance program (NFIP). The project is in compliance with flood insurance requirements.

**Supporting documentation**

[NFIP.png](#)

**Are formal compliance steps or mitigation required?**

Yes

✓ No

## Air Quality

General requirements	Legislation	Regulation
The Clean Air Act is administered by the U.S. Environmental Protection Agency (EPA), which sets national standards on ambient pollutants. In addition, the Clean Air Act is administered by States, which must develop State Implementation Plans (SIPs) to regulate their state air quality. Projects funded by HUD must demonstrate that they conform to the appropriate SIP.	Clean Air Act (42 USC 7401 et seq.) as amended particularly Section 176(c) and (d) (42 USC 7506(c) and (d))	40 CFR Parts 6, 51 and 93

**1. Does your project include new construction or conversion of land use facilitating the development of public, commercial, or industrial facilities OR five or more dwelling units?**

Yes

No

### Air Quality Attainment Status of Project's County or Air Quality Management District

**2. Is your project's air quality management district or county in non-attainment or maintenance status for any criteria pollutants?**

No, project's county or air quality management district is in attainment status for all criteria pollutants.

Yes, project's management district or county is in non-attainment or maintenance status for the following criteria pollutants (check all that apply):

### Screen Summary

#### Compliance Determination

According to NEPAssist, the proposed project site is not within a one-mile radius of air quality non-attainment areas for O<sub>3</sub>-zone 8hr, lead, SO<sub>2</sub> 1hr, PM<sub>2.5</sub> 24hr, PM 2.5 annual, PM 10, CO, or NO<sub>2</sub>. According to the 2023 EGLE NAAQS map, Ottawa county

does not contain any non-attainment areas. The project is in compliance with the Clean Air Act.

**Supporting documentation**

[2023 naaqs-ambient-status-map.pdf](#)

[NEPAssist\\_Analysis.pdf](#)

**Are formal compliance steps or mitigation required?**

Yes

✓ No

### Coastal Zone Management Act

General requirements	Legislation	Regulation
Federal assistance to applicant agencies for activities affecting any coastal use or resource is granted only when such activities are consistent with federally approved State Coastal Zone Management Act Plans.	Coastal Zone Management Act (16 USC 1451-1464), particularly section 307(c) and (d) (16 USC 1456(c) and (d))	15 CFR Part 930

**1. Is the project located in, or does it affect, a Coastal Zone as defined in your state Coastal Management Plan?**

Yes

No

**2. Does this project include new construction, conversion, major rehabilitation, or substantial improvement activities?**

Yes

No

**3. Has this project been determined to be consistent with the State Coastal Management Program?**

Yes, without mitigation

Based on the response, the review is in compliance with this section. Document and upload all documents used to make your determination below.

Yes, with mitigation

No, project must be canceled.

**Screen Summary**

**Compliance Determination**

Triterra queried the MSHDA and EGLE Coastal Zone Management Boundary Maps. The project is within a Coastal Zone Management Area. According to the June 28, 2024, letter from Matt Smar, the Federal Consistency Specialist of EGLE, the project is in consistency with the CZM Act provided all required permits are issued and complied with. The project is occurring in a heavily urbanized area and does not impact wetlands or other coastal elements. The project is in compliance with the Coastal Zone Management Act.

**Supporting documentation**

[MI Coastal Zone Management Area Map Statewide.pdf](#)  
[HUD Grand Haven YMCA 6-28-2024.pdf](#)  
[Coastal Zone Boundary Maps by county and township.pdf](#)

**Are formal compliance steps or mitigation required?**

Yes

No

## Contamination and Toxic Substances

General Requirements	Legislation	Regulations
It is HUD policy that all properties that are being proposed for use in HUD programs be free of hazardous materials, contamination, toxic chemicals and gases, and radioactive substances, where a hazard could affect the health and safety of the occupants or conflict with the intended utilization of the property.		24 CFR 58.5(i)(2) 24 CFR 50.3(i)
<b>Reference</b>		
<a href="https://www.onecpd.info/environmental-review/site-contamination">https://www.onecpd.info/environmental-review/site-contamination</a>		

**1. How was site contamination evaluated?\* Select all that apply.**

ASTM Phase I ESA

ASTM Phase II ESA

Remediation or clean-up plan

ASTM Vapor Encroachment Screening.

None of the above

\* HUD regulations at 24 CFR § 58.5(i)(2)(ii) require that the environmental review for multifamily housing with five or more dwelling units or non-residential property include the evaluation of previous uses of the site or other evidence of contamination on or near the site.

For acquisition and new construction of multifamily and nonresidential properties HUD strongly advises the review include an ASTM Phase I Environmental Site Assessment (ESA) to meet real estate transaction standards of due diligence and to help ensure compliance with HUD's toxic policy at 24 CFR §58.5(i) and 24 CFR §50.3(i). Also note that some HUD programs require an ASTM Phase I ESA.

**2. Were any on-site or nearby toxic, hazardous, or radioactive substances\* (excluding radon) found that could affect the health and safety of project occupants or conflict with the intended use of the property? (Were any recognized environmental conditions or RECs identified in a Phase I ESA and confirmed in a Phase II ESA?)**

Provide a map or other documentation of absence or presence of contamination\*\* and explain evaluation of site contamination in the Screen Summary at the bottom of this screen.

No

Explain:

✓ Yes

\* This question covers the presence of radioactive substances excluding radon. Radon is addressed in the Radon Exempt Question.

\*\* Utilize EPA's Enviromapper, NEPAassist, or state/tribal databases to identify nearby dumps, junk yards, landfills, hazardous waste sites, and industrial sites, including EPA National Priorities List Sites (Superfund sites), CERCLA or state-equivalent sites, RCRA Corrective Action sites with release(s) or suspected release(s) requiring clean-up action and/or further investigation. Additional supporting documentation may include other inspections and reports.

**3. Evaluate the building(s) for radon. Do all buildings meet any of the exemptions\* from having to consider radon in the contamination analysis listed in CPD Notice [CPD-23-103](#)?**

Yes

Explain:

✓ No

\* Notes:

- Buildings with no enclosed areas having ground contact.
- Buildings containing crawlspaces, utility tunnels, or parking garages would not be exempt, however buildings built on piers would be exempt, provided that there is open air between the lowest floor of the building and the ground.
- Buildings that are not residential and will not be occupied for more than 4 hours per day.
- Buildings with existing radon mitigation systems - document radon levels are below 4 pCi/L with test results dated within two years of submitting the application for HUD assistance and document the system includes an ongoing maintenance plan that includes periodic testing to ensure the system continues to meet the current EPA recommended levels. If the project does not require an application, document test results dated within two years of the date the environmental review is certified. Refer to program office guidance to ensure compliance with program requirements.
- Buildings tested within five years of the submission of application for HUD assistance: test results document indoor radon levels are below current the EPA's recommended action levels of 4.0 pCi/L. For buildings with test data older than five years, any new environmental review must include a consideration of radon using one of the methods in Section A below.



**4. Is the proposed project new construction or substantial rehabilitation where testing will be conducted but cannot yet occur because building construction has not been completed?**

Yes

Compliance with this section is conditioned on post-construction testing being conducted, followed by mitigation, if needed. Radon test results, along with any needed mitigation plan, must be uploaded to the mitigation section within this screen.

No

**5. Was radon testing or a scientific data review conducted that provided a radon concentration level in pCi/L?**

Yes

No

If no testing was conducted and a review of science-based data offered a lack of science-based data for the project site, then document and upload the steps taken to look for documented test results and science-based data as well as the basis for the conclusion that testing would be infeasible or impracticable.

Explain:

File Upload:

Based on the response, the review is in compliance with this section. Continue to the Screen Summary at the bottom of this screen.

Non-radon contamination was found in a previous question.

**6. How was radon data collected?**

All buildings involved were tested for radon

A review of science-based data was conducted

Enter the Radon concentration value, in pCi/L, derived from the review of science-based data:

2.5

Provide the documentation\* used to derive this value:

Radon testing data from the CDC Environmental Public Health Tracking Network map found at <https://www.cdc.gov/nceh/tracking/topics/RadonTesting.htm> shows data for the county in which the project site is located (Ottawa County) which is the smallest area for which data is available. The data shows the annual mean pre-mitigation radon measurement in tested buildings for the most recent 10-year period as 2.5 pCi/L. There is no other available evidence of radon levels in the area.

File Upload:

[Radon.png](#)

Based on the response, the review is in compliance with this section. Continue to the Screen Summary at the bottom of this screen.

Radon concentration value is greater than or equal to 4.0 pCi/L and/or non-radon contamination was found in a previous question. Continue to Mitigation.

\* For example, if you conducted radon testing then provide a testing report (such as an ANSI/AARST report or DIY test) if applicable (note: DIY tests are not eligible for use in multifamily buildings), or documentation of the test results. If you conducted a scientific data review, then describe and cite the maps and data used and include copies of all supporting documentation. Ensure that the best available data is utilized, if conducting a scientific data review.

## 8. Mitigation

Document the mitigation needed according to the requirements of the appropriate federal, state, tribal, or local oversight agency. If the adverse environmental impacts cannot be mitigated, then HUD assistance may not be used for the project at this site.

For instances where radon mitigation is required (i.e. where test results demonstrated

radon levels at 4.0 pCi/L and above), then you must include a radon mitigation plan\*.

**Can all adverse environmental impacts be mitigated?**

No, all adverse environmental impacts cannot feasibly be mitigated.  
Project cannot proceed at this location.

- ✓ Yes, all adverse environmental impacts can be eliminated through mitigation, and/or consideration of radon and radon mitigation, if needed, will occur following construction.  
Provide all mitigation requirements\*\* and documents in the Screen Summary at the bottom of this screen.

\* Refer to CPD Notice [CPD-23-103](#) for additional information on radon mitigation plans.

\*\* Mitigation requirements include all clean-up requirements required by applicable federal, state, tribal, or local law. Additionally, please upload, as applicable, the long-term operations and maintenance plan, Remedial Action Work Plan, and other equivalent documents.

**9. Describe how compliance was achieved. Include any of the following that apply: State Voluntary Clean-up Program, a No Further Action letter, use of engineering controls\*, or use of institutional controls\*\*.**

Based on Triterra's understanding of the renovation activities planned for the Property, proper abatement of the asbestos-containing materials is required if they may be disturbed (broken, cut, drilled, abraded, ground, sanded, etc.) during such activities. All abatement/ demolition activities should take into consideration that paints containing lead and chromium may be present, and therefore lead-safe work practices should be utilized throughout the abatement and demolition process to prevent employee exposure. Contractors performing demolition activities must have up-to-date lead awareness training prior to performing any work-related activities. Triterra strongly recommends an Abatement Specification be assembled to address the ACM identified within the building. The purpose of this document is to specify incidental procedures and equipment required to protect workers from contact with airborne asbestos fibers and ensure that all ACM is properly abated prior to the scheduled demolition. This document identifies Contractor requirements for submittals, State notification, waste disposal, employee qualification, air monitoring, etc. Depending on the type and quantities of ACM that will be removed from the structure, a notification may need to be provided to the following regulatory

agencies 10 working (or calendar) days prior to the commencement of work with the submittal of a Notification of Intent to Renovate/Demolish form (EQP5661). The retained asbestos abatement contractor should complete this form as part of their services. This notification should be provided to the Michigan Department of Environment, Great Lakes, and Energy - Air Quality Division (EGLE-AQD) and the Michigan Department of Labor and Economic Opportunity (LEO) any time renovation/demolition/asbestos abatement is to be completed on a building.

If a remediation plan or clean-up program was necessary, which standard does it follow?

Complete removal

Risk-based corrective action (RBCA)

✓ Other

\* Engineering controls are any physical mechanism used to contain or stabilize contamination or ensure the effectiveness of a remedial action. Engineering controls may include, caps, covers, dikes, trenches, leachate collection systems, radon mitigation systems, signs, fences, physical access controls, ground water monitoring systems and ground water containment systems including, slurry walls and ground water pumping systems.

\*\* Institutional controls are mechanisms used to limit human activities at or near a contaminated site, or to ensure the effectiveness of the remedial action over time, when contaminants remain at a site at levels above the applicable remediation standard which would allow for unrestricted use of the property. Institutional controls may include structure, land, and natural resource use restrictions, well restriction areas, classification exception areas, deed notices, and declarations of environmental restrictions.

### **Screen Summary**

#### **Compliance Determination**

Contamination On July 15, 2024 Triterra reviewed environmental and historical records, and reviewed local physiographic, geologic, and hydrologic information to determine historical and current land ownership and use, physical setting, and identify potential environmental conditions associated with the subject property. The following records and data sources were searched, and the pertinent findings are provided below. Topographic Maps (1930-2018) Google Earth Pro Historical Satellite Images (1980-2023) Michigan Department of Environment, Great Lakes and Energy - RIDE Mapper Michigan Department of Environment, Great Lakes, and Energy -

Remediation Information Data Exchange (RIDE) Michigan Department of Environment, Great Lakes and Energy MiEnviro Portal Michigan Department of Environment, Great Lakes, and Energy - Historic and Active Dry Cleaning Lists United States Environmental Protection Agency NEPAassist Based on the property's topographic position and distance from sites of environmental concern, it is Triterra's opinion that the proposed project location is unlikely to have significant environmental concerns. Radon According to the CDC Environmental Public Health Tracking Network map for Ottawa County, the annual mean pre-mitigation radon measurement in tested buildings for the most recent 10-year period is 2.5 pCi/L. There is no other available evidence of radon levels in the area. Since the data indicates the average radon levels in Ottawa county are less than 4.0 pCi/L, no further action is required at this time. Lead AAA Lead Inspections, Inc. (AAA) completed a Lead Risk Assessment Report for the Child Development Program areas of the Property building on July 29, 2016. According to the report, no lead-based paint hazards were identified within these areas. Asbestos On November 4, 2024 Materials Testing Consultants performed an Asbestos Materials Survey for the building located at 1 Y Drive, Grand Haven, Michigan. According to the report the Friable asbestos containing materials (ACM) were identified during the inspection (HM 22) and non-friable ACM were identified (HM 2, HM 13, HM 27, HM 32, HM 39, HM 53, HM 55, HM 58, HM 94, HM 119, HM 128, and HM 130). Additional materials were not tested and assumed to be asbestos containing materials (See attached report for additional information). Based on Triterra's understanding of the renovation activities planned for the Property, proper abatement of the asbestos-containing materials is required if they may be disturbed during such activities. All abatement/demolition activities should take into consideration that paints containing lead and chromium may be present, therefore lead-safe work practices should be utilized throughout the abatement/demolition process to prevent employee exposure. Contractors performing demolition activities must have up-to-date lead awareness training prior to performing any work-related activities. Triterra recommends an Abatement Specification be assembled to address the ACM identified within the building. The purpose of this document is to specify incidental procedures and equipment required to protect workers from contact with airborne asbestos fibers and ensure that all ACM is properly abated prior to the scheduled demolition. Depending on the type and quantities of ACM that will be removed from the structure, a notification may need to be provided to the following regulatory agencies 10 working (or calendar) days prior to the commencement of work with the submittal of a Notification of Intent to Renovate/Demolish form (EQP5661). The retained asbestos abatement contractor should complete this form as part of their services. This notification should be provided to EGLE-AQD and the Michigan Department of Labor and Economic Opportunity (LEO) any time renovation/demolition/asbestos abatement is to be completed on a building.

**Supporting documentation**

[1995.pdf](#)

[1 Y Drive Lead Risk Assessment for Child Development Program.pdf](#)

[US coast guard\\_2010 data and plume.pdf](#)

[RIDE Mapper.png](#)

[241757 Tri Cities Family YMCA Asbestos Survey Report Revision 1.pdf](#)

**Are formal compliance steps or mitigation required?**

Yes

No

**Endangered Species**

General requirements	ESA Legislation	Regulations
Section 7 of the Endangered Species Act (ESA) mandates that federal agencies ensure that actions that they authorize, fund, or carry out shall not jeopardize the continued existence of federally listed plants and animals or result in the adverse modification or destruction of designated critical habitat. Where their actions may affect resources protected by the ESA, agencies must consult with the Fish and Wildlife Service and/or the National Marine Fisheries Service (“FWS” and “NMFS” or “the Services”).	The Endangered Species Act of 1973 (16 U.S.C. 1531 <i>et seq.</i> ); particularly section 7 (16 USC 1536).	50 CFR Part 402

**1. Does the project involve any activities that have the potential to affect species or habitats?**

- ✓ No, the project will have No Effect due to the nature of the activities involved in the project.

This selection is only appropriate if none of the activities involved in the project have potential to affect species or habitats. Examples of actions without potential to affect listed species may include: purchasing existing buildings, completing interior renovations to existing buildings, and replacing exterior paint or siding on existing buildings.

Based on the response, the review is in compliance with this section.

No, the project will have No Effect based on a letter of understanding, memorandum of agreement, programmatic agreement, or checklist provided by local HUD office

Yes, the activities involved in the project have the potential to affect species and/or habitats.

**Screen Summary**

**Compliance Determination**

According to the USFWS iPac official species list (January 6, 2025), the following threatened and endangered species are listed for Ottawa County: Myotis sodalis (Indiana Bat [IBat]), Charadrius melodus (Piping Plover), Calidris canutus rufe (Rufa

Red Knot), *Sistrurus catenatus* (Eastern Massasauga Rattlesnake [EMR]), and *Cirsium pitcheri* (Pitchers Thistle). The subject property does not contain suitable habitat for the listed threatened or endangered species for Ottawa County. The proposed project activities consist of the rehabilitation of an existing building in a developed lot with manicured lawns, a parking lot, scattered trees and shrubs in an established residential and commercial corridor. The project area is not likely to contain any critical habitats. Consultation with the U.S. Fish and Wildlife Service or the State of Michigan Department of Natural Resources is not required. This project is in compliance with the Endangered Species Act.

**Supporting documentation**

[2025\\_1\\_6\\_Species\\_List\\_Michigan\\_Ecological\\_Services\\_Field\\_Office.pdf](#)

**Are formal compliance steps or mitigation required?**

Yes

✓ No



## Explosive and Flammable Hazards

General requirements	Legislation	Regulation
HUD-assisted projects must meet Acceptable Separation Distance (ASD) requirements to protect them from explosive and flammable hazards.	N/A	24 CFR Part 51 Subpart C

**1. Is the proposed HUD-assisted project itself the development of a hazardous facility (a facility that mainly stores, handles or processes flammable or combustible chemicals such as bulk fuel storage facilities and refineries)?**

No

Yes

**2. Does this project include any of the following activities: development, construction, rehabilitation that will increase residential densities, or conversion?**

No

Based on the response, the review is in compliance with this section.

Yes

### Screen Summary

#### **Compliance Determination**

The proposed project does not include the development of a hazardous facility (a facility that mainly stores, handles or processes flammable or combustible chemicals such as bulk fuel storage facilities and refineries) OR the development, construction, rehabilitation that will increase residential densities, or conversion. The proposed project is in compliance with this section.

#### **Supporting documentation**

[2024 11 15 TCFY Design Development Issuance.pdf](#)

**Are formal compliance steps or mitigation required?**

Tri-Cities-YMCA--Building-  
for-Our-Future-Capital-  
Improvement

Grand Haven, MI

900000010445929

Yes

✓ No

## Farmlands Protection

General requirements	Legislation	Regulation
The Farmland Protection Policy Act (FPPA) discourages federal activities that would convert farmland to nonagricultural purposes.	Farmland Protection Policy Act of 1981 (7 U.S.C. 4201 et seq.)	<a href="#">7 CFR Part 658</a>

**1. Does your project include any activities, including new construction, acquisition of undeveloped land or conversion, that could convert agricultural land to a non-agricultural use?**

Yes

No

If your project includes new construction, acquisition of undeveloped land or conversion, explain how you determined that agricultural land would not be converted:

Based on the response, the review is in compliance with this section. Document and upload all documents used to make your determination below.

### Screen Summary

#### **Compliance Determination**

This project does not include any activities that could potentially convert agricultural land to a non-agricultural use. The project is in compliance with the Farmland Protection Policy Act.

#### **Supporting documentation**

[Soil survey\\_farm.pdf](#)

**Are formal compliance steps or mitigation required?**

Yes

No

## Floodplain Management

General Requirements	Legislation	Regulation
Executive Order 11988, Floodplain Management, requires Federal activities to avoid impacts to floodplains and to avoid direct and indirect support of floodplain development to the extent practicable.	Executive Order 11988 * Executive Order 13690 * 42 USC 4001-4128 * 42 USC 5154a * only applies to screen 2047 and not 2046	24 CFR 55

**1. Does this project meet an exemption at 24 CFR 55.12 from compliance with HUD's floodplain management regulations in Part 55?**

Yes

(a) HUD-assisted activities described in 24 CFR 58.34 and 58.35(b).

(b) HUD-assisted activities described in 24 CFR 50.19, except as otherwise indicated in § 50.19.

(c) The approval of financial assistance for restoring and preserving the natural and beneficial functions and values of floodplains and wetlands, including through acquisition of such floodplain and wetland property, where a permanent covenant or comparable restriction is place on the property's continued use for flood control, wetland projection, open space, or park land, but only if:

(1) The property is cleared of all existing buildings and walled structures; and

(2) The property is cleared of related improvements except those which:

(i) Are directly related to flood control, wetland protection, open space, or park land (including playgrounds and recreation areas);

(ii) Do not modify existing wetland areas or involve fill, paving, or other ground disturbance beyond minimal trails or paths; and

(iii) Are designed to be compatible with the beneficial floodplain or wetland function of the property.

(d) An action involving a repossession, receivership, foreclosure, or similar acquisition of property to protect or enforce HUD's financial interests under previously approved loans, grants, mortgage insurance,

or other HUD assistance.

(e) Policy-level actions described at 24 CFR 50.16 that do not involve site-based decisions.

(f) A minor amendment to a previously approved action with no additional adverse impact on or from a floodplain or wetland.

(g) HUD's or the responsible entity's approval of a project site, an incidental portion of which is situated in the FFRMS floodplain (not including the floodway, LiMWA, or coastal high hazard area) but only if: (1) The proposed project site does not include any existing or proposed buildings or improvements that modify or occupy the FFRMS floodplain except de minimis improvements such as recreation areas and trails; and (2) the proposed project will not result in any new construction in or modifications of a wetland .

(h) Issuance or use of Housing Vouchers, or other forms of rental subsidy where HUD, the awarding community, or the public housing agency that administers the contract awards rental subsidies that are not project-based (i.e., do not involve site-specific subsidies).

(i) Special projects directed to the removal of material and architectural barriers that restrict the mobility of and accessibility to elderly and persons with disabilities.

Describe:

No

**2. Does the project include a Critical Action? Examples of Critical Actions include projects involving hospitals, fire and police stations, nursing homes, hazardous chemical storage, storage of valuable records, and utility plants.**

Yes

Describe:

No

**3. Determine the extent of the FFRMS floodplain and provide mapping documentation in support of that determination**

The extent of the FFRMS floodplain can be determined using a Climate Informed Science Approach (CISA), 0.2 percent flood approach (0.2 PFA), or freeboard value approach (FVA). For projects in areas without available CISA data or without FEMA Flood Insurance Rate Maps (FIRMs), Flood Insurance Studies (FISs) or Advisory Base Flood Elevations (ABFEs), use the best available information<sup>1</sup> to determine flood elevation. Include documentation and an explanation of why this is the best available information<sup>2</sup> for the site. Note that newly constructed and substantially improved<sup>3</sup> structures must be elevated to the FFRMS floodplain regardless of the approach chosen to determine the floodplain.

Select one of the following three options:

CISA for non-critical actions. If using a local tool, data, or resources, ensure that the FFRMS elevation is higher than would have been determined using the 0.2 PFA or the FVA.

0.2-PFA. Where FEMA has defined the 0.2-percent-annual-chance floodplain, the FFRMS floodplain is the area that FEMA has designated as within the 0.2-percent-annual-chance floodplain.

- ✓ FVA. If neither CISA nor 0.2-PFA is available, for non-critical actions, the FFRMS floodplain is the area that results from adding two feet to the base flood elevation as established by the effective FIRM or FIS or — if available — a FEMA-provided preliminary or pending FIRM or FIS or advisory base flood elevations, whether regulatory or informational in nature. However, an interim or preliminary FEMA map cannot be used if it is lower than the current FIRM or FIS.

<sup>1</sup> Sources which merit investigation include the files and studies of other federal agencies, such as the U. S. Army Corps of Engineers, the Tennessee Valley Authority, the Soil Conservation Service and the U. S. Geological Survey. These agencies have prepared flood hazard studies for several thousand localities and, through their technical assistance programs, hydrologic studies, soil surveys, and other investigations have collected or developed other floodplain information for numerous sites and areas. States and communities are also sources of information on past flood experiences within their boundaries and are particularly knowledgeable about areas subject to high-risk flood hazards such as alluvial fans, high velocity flows, mudflows and mudslides, ice jams, subsidence and liquefaction.

<sup>2</sup> If you are using best available information, select the FVA option below and provide supporting documentation in the screen summary. Contact your [local environmental officer](#) with additional compliance questions.

<sup>3</sup> Substantial improvement means any repair or improvement of a structure which costs at least

50 percent of the market value of the structure before repair or improvement or results in an increase of more than 20 percent of the number of dwelling units. The full definition can be found at [24 CFR 55.2\(b\)\(12\)](#).

5. Does your project occur in the FFRMS floodplain?

Yes

✓ No

### **Screen Summary**

#### **Compliance Determination**

According to the National Flood Hazard Layer FIRMette map, Map Panel Number 26139C0086F (effective 10/21/2021) the proposed project is located in an area of minimal chance flood hazard (Zone X Floodplain). On 6/24/2024 Triterra utilized the Federal Flood Standard Support Tool Beta V1.1.5 which generated a Freeboard Value Approach report. According to the report, the proposed project is not located within the FFRMS (Federal Flood Risk Management Standard) floodplain. Additionally, Triterra utilized the USGS elevation query system to confirm that the proposed project location is greater than 2-feet above the 100-year base floodplain elevation (BFE); the project elevation is approximately 620 feet while the 100-year BFE is 583 feet. Therefore, the proposed project is not within the FFRMS and is in compliance with 24 CFR 55. This project does not occur in the FFRMS floodplain. The project is in compliance with Executive Orders 11988 and 13690.

#### **Supporting documentation**

[FIRMETTE\(1\).pdf](#)

[FFRMS\\_Freeboard\\_Value\\_Approach\\_Report.pdf](#)

**Are formal compliance steps or mitigation required?**

Yes

✓ No

**Historic Preservation**

General requirements	Legislation	Regulation
Regulations under Section 106 of the National Historic Preservation Act (NHPA) require a consultative process to identify historic properties, assess project impacts on them, and avoid, minimize, or mitigate adverse effects	Section 106 of the National Historic Preservation Act (16 U.S.C. 470f)	36 CFR 800 “Protection of Historic Properties” <a href="https://www.govinfo.gov/content/pkg/CFR-2012-title36-vol3/pdf/CFR-2012-title36-vol3-part800.pdf">https://www.govinfo.gov/content/pkg/CFR-2012-title36-vol3/pdf/CFR-2012-title36-vol3-part800.pdf</a>

**Threshold**

**Is Section 106 review required for your project?**

No, because the project consists solely of activities listed as exempt in a Programmatic Agreement (PA ). (See the PA Database to find applicable PAs.)

No, because the project consists solely of activities included in a No Potential to Cause Effects memo or other determination [36 CFR 800.3(a)(1)].

- ✓ Yes, because the project includes activities with potential to cause effects (direct or indirect).

**Step 1 – Initiate Consultation**

**Select all consulting parties below (check all that apply):**

- ✓ State Historic Preservation Offer (SHPO) Completed
- ✓ Indian Tribes, including Tribal Historic Preservation Officers (THPOs) or Native Hawaiian Organizations (NHOs)



✓ Lac Vieux Desert Band of Lake Superior Chippewa	Response Period Elapsed
✓ Little River Band of Ottawa Indians, MI	Response Period Elapsed
✓ Little Traverse Bay Bands of Odawa Indians, MI	Response Period Elapsed
✓ Menominee Indian Tribe of Wisconsin	Response Period Elapsed
✓ Miami Tribe of Oklahoma	Response Period Elapsed
✓ Ottawa Tribe of Oklahoma	Response Period Elapsed
✓ Red Lake Band of Chippewa Indians, MN	Response Period Elapsed
✓ Sault Ste. Marie Tribe of Chippewa Indians, MI	Response Period Elapsed

#### Other Consulting Parties

**Describe the process of selecting consulting parties and initiating consultation here:**

Triterra utilized the US Department of Housing and Urban Development Tribal Directory Assessment Tool (TDAT) to identify Native American Nations associated with Ottawa County. The City of Grand Haven (the RE) sent notices of intent for the Proposed Project to all identified Nations on July 15, 2024 via email.

Document and upload all correspondence, notices and notes (including comments and objections received below).

**Was the Section 106 Lender Delegation Memo used for Section 106 consultation?**

- Yes
- No

***Step 2 – Identify and Evaluate Historic Properties***

- 1. Define the Area of Potential Effect (APE), either by entering the address(es) or uploading a map depicting the APE below:**

**In the chart below, list historic properties identified and evaluated in the APE. Every**

**historic property that may be affected by the project should be included in the chart.**

Upload the documentation (survey forms, Register nominations, concurrence(s) and/or objection(s), notes, and photos) that justify your National Register Status determination below.

<b>Address / Location / District</b>	<b>National Register Status</b>	<b>SHPO Concurrence</b>	<b>Sensitive Information</b>
1 Y Drive, Grand Haven MI	Not Eligible	Yes	✓ Not Sensitive
650 S Harbor Drive, Grand Haven, MI	Eligible	Yes	✓ Not Sensitive
700 S Harbor Drive, Grand Haven, MI	Eligible	Yes	✓ Not Sensitive

**Additional Notes:**

**2. Was a survey of historic buildings and/or archeological sites done as part of the project?**

✓ Yes

Document and upload surveys and report(s) below.  
For Archeological surveys, refer to HP Fact Sheet #6, Guidance on Archeological Investigations in HUD Projects.

Additional Notes:

No

***Step 3 –Assess Effects of the Project on Historic Properties***

Only properties that are listed on or eligible for the National Register of Historic Places receive further consideration under Section 106. Assess the effect(s) of the project by applying the Criteria of Adverse Effect. (36 CFR 800.5)] Consider direct and indirect effects as applicable as per guidance on direct and indirect effects.

**Choose one of the findings below - No Historic Properties Affected, No Adverse Effect, or**

**Adverse Effect; and seek concurrence from consulting parties.**

- ✓ No Historic Properties Affected

Based on the response, the review is in compliance with this section. Document and upload concurrence(s) or objection(s) below.

**Document reason for finding:**

No historic properties present.

- ✓ Historic properties present, but project will have no effect upon them.

No Adverse Effect

Adverse Effect

**Screen Summary**

**Compliance Determination**

State Historic Preservation Office/Section 106 On December 12, 2024, a section 106 Application was completed and submitted for the Proposed Project area by Ashley Latsch of The City of Grand Haven. According to a letter dated January 2, 2025, the State of Michigan - State Historic Preservation Office (SHPO) determined that the effects of the proposed undertaking do not meet the criteria of adverse effect. Therefore, the project will have no adverse effect on historic properties within the area of the proposed project area. Tribal Historic Preservation Officer (THPO) Consultation Triterra utilized the US Department of Housing and Urban Development Tribal Directory Assessment Tool (TDAT) to identify Native American Nations associated with Ottawa County. The City of Grand Haven (the RE) sent notices of intent for the Proposed Project to all identified Nations on July 15, 2024 via email: Lac Vieux Desert Band of Lake Superior Chippewa Indians of Michigan Little River Band of Ottawa Indians, MI Little Traverse Bay Bands of Odawa Indians, MI Menominee Indian Tribe of Wisconsin Miami Tribe of Oklahoma Ottawa Tribe of Oklahoma Red Lake Band of Chippewa Indians, MN Sault Ste. Marie Tribe of Chippewa Indians, MI No responses have been received by the RE as of the date of the report.

**Supporting documentation**

[TriCities YMCA\\_Architecture.pdf](#)  
[TrCities YMCA\\_ARCHAEOLOGICAL REVIEW.pdf](#)  
[Tri-cities YMCA\\_106 SHPO application.pdf](#)  
[25-199 NAE.pdf](#)

**Are formal compliance steps or mitigation required?**

Yes

✓ No

**Noise Abatement and Control**

General requirements	Legislation	Regulation
HUD’s noise regulations protect residential properties from excessive noise exposure. HUD encourages mitigation as appropriate.	Noise Control Act of 1972  General Services Administration Federal Management Circular 75-2: “Compatible Land Uses at Federal Airfields”	Title 24 CFR 51 Subpart B

**1. What activities does your project involve? Check all that apply:**

New construction for residential use

Rehabilitation of an existing residential property

A research demonstration project which does not result in new construction or reconstruction

An interstate land sales registration

Any timely emergency assistance under disaster assistance provision or appropriations which are provided to save lives, protect property, protect public health and safety, remove debris and wreckage, or assistance that has the effect of restoring facilities substantially as they existed prior to the disaster

✓ None of the above

**Screen Summary**

**Compliance Determination**

The proposed project does not include new construction for residential use, rehabilitation of an existing residential property, or a research demonstration project which does not result new construction or reconstruction, interstate, land sales registration, or any timely emergency assistance under disaster assistance provisions or appropriations which are provided to save lives, protect property, protect public health and safety, remove debris and wreckage, or assistance that has the effect of restoring facilities substantially as they existed prior to the disaster. The project is in compliance with HUD's Noise regulation.

**Supporting documentation**

**Are formal compliance steps or mitigation required?**

Yes

✓ No

### Sole Source Aquifers

General requirements	Legislation	Regulation
<b>The Safe Drinking Water Act of 1974 protects drinking water systems which are the sole or principal drinking water source for an area and which, if contaminated, would create a significant hazard to public health.</b>	Safe Drinking Water Act of 1974 (42 U.S.C. 201, 300f et seq., and 21 U.S.C. 349)	40 CFR Part 149

1. Does the project consist solely of acquisition, leasing, or rehabilitation of an existing building(s)?

✓ Yes

Based on the response, the review is in compliance with this section.

No

#### Screen Summary

##### **Compliance Determination**

Based on the project description, the project consists of activities that are unlikely to have an adverse impact on groundwater resources. Additionally, according to EPA Region V, no designated Sole Source Aquifers are located in the area of the project site or Michigan. Therefore, the proposed project is in compliance with 40 CFR Part 149.

##### **Supporting documentation**

[EPA Sole Source Aquifer Map\\_2023.png](#)

Are formal compliance steps or mitigation required?

Yes

✓ No

## Wetlands Protection

General requirements	Legislation	Regulation
Executive Order 11990 discourages direct or indirect support of new construction impacting wetlands wherever there is a practicable alternative. The Fish and Wildlife Service's National Wetlands Inventory can be used as a primary screening tool, but observed or known wetlands not indicated on NWI maps must also be processed. Off-site impacts that result in draining, impounding, or destroying wetlands must also be processed.	Executive Order 11990	24 CFR 55.20 can be used for general guidance regarding the 8 Step Process.

**1. Does this project involve new construction as defined in Executive Order 11990, expansion of a building's footprint, or ground disturbance? The term "new construction" shall include draining, dredging, channelizing, filling, diking, impounding, and related activities and any structures or facilities begun or authorized after the effective date of the Order**

No

Yes

**2. Will the new construction or other ground disturbance impact an on- or off-site wetland? The term "wetlands" means those areas that are inundated by surface or ground water with a frequency sufficient to support, and under normal circumstances does or would support, a prevalence of vegetative or aquatic life that requires saturated or seasonally saturated soil conditions for growth and reproduction. Wetlands generally include swamps, marshes, bogs, and similar areas such as sloughs, potholes, wet meadows, river overflows, mud flats, and natural ponds.**

**"Wetlands under E.O. 11990 include isolated and non-jurisdictional wetlands."**

No, a wetland will not be impacted in terms of E.O. 11990's definition of new construction.

Based on the response, the review is in compliance with this section. Document and upload a map or any other relevant documentation below which explains your determination



Yes, there is a wetland that be impacted in terms of E.O. 11990's definition of new construction.

**Screen Summary**

**Compliance Determination**

The proposed project location is a 2.32-acre of developed land with one commercial building, paved parking lot, and landscaping. Triterra reviewed the USFWS Wetland Mapper, EGLE Wetlands Map Viewer, historical topography, NRCS web soil survey, and a review of historical aerials and no suspect wetlands were identified on the property. The project is in compliance with Executive Order 11990.

**Supporting documentation**

[EGLE wetland.pdf](#)

[USFWS wetlands.pdf](#)

[Soil survey hydric.pdf](#)

**Are formal compliance steps or mitigation required?**

Yes

✓ No

## Wild and Scenic Rivers Act

General requirements	Legislation	Regulation
The Wild and Scenic Rivers Act provides federal protection for certain free-flowing, wild, scenic and recreational rivers designated as components or potential components of the National Wild and Scenic Rivers System (NWSRS) from the effects of construction or development.	The Wild and Scenic Rivers Act (16 U.S.C. 1271-1287), particularly section 7(b) and (c) (16 U.S.C. 1278(b) and (c))	36 CFR Part 297

### 1. Is your project within proximity of a NWSRS river?

No

Yes, the project is in proximity of a Designated Wild and Scenic River or Study Wild and Scenic River.

Yes, the project is in proximity of a Nationwide Rivers Inventory (NRI) River.

### Screen Summary

#### **Compliance Determination**

This project is not within proximity of a NWSRS river, a current study river, or an NRI listed river. The project is in compliance with the Wild and Scenic Rivers Act.

#### **Supporting documentation**

[Nationwide Rivers Inventory.pdf](#)

[MI Wild and Scenic Rivers Map Statewide.pdf](#)

#### **Are formal compliance steps or mitigation required?**

Yes

No

**Environmental Justice**

General requirements	Legislation	Regulation
Determine if the project creates adverse environmental impacts upon a low-income or minority community. If it does, engage the community in meaningful participation about mitigating the impacts or move the project.	Executive Order 12898	

**HUD strongly encourages starting the Environmental Justice analysis only after all other laws and authorities, including Environmental Assessment factors if necessary, have been completed.**

**1. Were any adverse environmental impacts identified in any other compliance review portion of this project’s total environmental review?**

Yes

✓ No

Based on the response, the review is in compliance with this section.

**Screen Summary**

**Compliance Determination**

According to the USEPA EJ Screen, within a one-mile radius of the proposed project site, approximately 7% of the population identifies as People of Color, 5% of the population is considered unemployed and 22% of the population are considered low-income. The proposed project consists of the construction of two additions and multiple renovations on the current YMCA building. One addition will be utilized as a child care facility that will increase the availability of affordable childcare spots at the YMCA. Also, the mechanical, operational, and structural improvements are required to ensure the long-term sustainability of the facility. The proposed improvements will implement Universal Design principles to make the entire YMCA accessible to those with limited mobility. No adverse environmental impacts were identified for the property that are disproportionately high for low-income and/or minority communities in the area. According to the EGLE EJ Screen (Draft) tool, the project area is located in an area with a MiEJ Score 47 percentile. The project is in compliance with Executive Order 12898.

**Supporting documentation**

[EJScreen Community Report.pdf](#)

[MI EJ Score.png](#)

**Are formal compliance steps or mitigation required?**

Yes

No