

**Environmental Assessment
Determinations and Compliance Findings
for HUD-assisted Projects
24 CFR Part 58**

Project Information

Project Name: 1212-Larkin

HEROS Number: 900000010096348

Responsible Entity (RE): ELGIN, 150 Dexter Ct Elgin IL, 60120

RE Preparer: Julia Thavong

State / Local Identifier: Elgin Responsible Entity

Certifying Officer: Marc Mylott

Grant Recipient (if different than Responsible Entity):

Point of Contact:

Consultant (if applicable):

Point of Contact:

Project Location: 1212 Larkin Ave, Elgin, IL 60123

Additional Location Information:

The project is located on the west side of the City of Elgin in a stable mixed-use neighborhood. The project is located next to mass transit options, additionally amenities such as schools, places of worship, recreational activities, shopping, and healthcare resources are a walkable distance from the project.

Direct Comments to: Julia Thavong, Project Manager - thavongjulia@co.kane.il.us
Kane County Office of Community Reinvestment
719 S. Batavia Ave.
Geneva, IL 60134

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

For over 100 years, the historic Larkin Center property has served an important community purpose in Elgin. Yet in recent years this landmark has deteriorated into a foreclosed vacant property in an otherwise stable neighborhood. With this proposal, Full Circle Communities, and Illinois based non-profit, proposes not only to restore the property's important architectural heritage, but also its history as a purpose-built community asset. The preservation of the Larkin Center's historic buildings and addition of new construction townhomes and flats will give this amenity-rich site a laudable new use, providing high-quality workforce units for individuals and families, as well as units for persons with disabilities. This proposed development will create 47 residential units and one employee unit across a mix of townhomes and flats, including the adaptive reuse of two historic buildings in a mix of studio, one-, two-, and three-bedroom units all affordable at or below the 60% AMI level. The locally landmarked Larkin Center and accompanying hospital building will be restored and listed on the National Register of Historic Places. The three non-contributing buildings will be demolished and replaced with a mix of newly constructed well-designed townhomes, flats, and a clubhouse. The Larkin Center building and clubhouse building will be elevator-served with a mix of accessible and adaptable units across the property. The clubhouse building will serve as an accessible vertical transfer between the north and south ends of the sloped site. The clubhouse and Larkin building will also house a laundry room, computer lab, library/study room, community lounges, fitness center, and tenant bulk storage. The development incorporates universal design elements and green building features. The property will include on-site property management and resident amenity spaces. On-site services will take a two-pronged approach. On one hand, services will be available on-site through The Association for Individual Development (AID), targeted to persons with disabilities. On the other hand, services will also be available focused on financial counseling, credit repair, and connections to first-time home buyer programs. The Larkin property is ideally located in a neighborhood of strong institutions with multiple schools, the YMCA, Ecker Center, healthcare resources, and retail nearby. With a bus line right outside the door, the site provides access to 55,000 jobs within a 30 minute transit ride as well as a direct bus route to AID's South Elgin location. FCC and the design team have worked very closely with the City of Elgin Community Development Department to ensure a high-quality, historically sensitive, and contextual development. The proposal's new construction infill element complements and enhances both the existing neighborhood as well as the historic nature of the Larkin Center. The development will seek green certification from the National Green Building Service.

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

The proposed development will provide a range of sorely needed housing options at a variety of incomes levels--serving those living on disability as well as working families earning up to \$55,000 annually. An elevator is planned for the Larkin building and the clubhouse, creating accessible, universally designed units for persons with disabilities, as well as a site that can be accessibly traversed. Wrap around services will be provided by AID, which combined with design features, makes 1212 Larkin a place

that persons with disabilities can live independently and call home. Furthermore, the development with its financial counseling services, and townhome designed units, will also create a launching pad for homeownership. When households find a quality home with a rent their income supports, they can start to save towards homeownership and engage in credit repair and financial counseling services. Supportive services from AID will assist individuals and family members with developmental, physical and/or mental disabilities, or those who have suffered a trauma or those at-risk. AID's numerous program offerings include early intervention; developmental therapy; audiology; autism programs; developmental and vocational training; job placement and on-the-job coaching services; crisis intervention; victims services; community education; behavioral health and advocacy. FCC will also partner with the Housing Authority of Elgin to provide services related to family self-sufficiency, youth development, and workforce development, including trainings for conflict management, time management, communication and other career-readiness skills, technology training, financial literacy and credit counseling, and homeownership counseling. Given the number of workforce housing units, we plan to offer homeownership training for residents, giving them the skills to plan for eventual homeownership.

Existing Conditions and Trends [24 CFR 58.40(a)]:

1212 Larkin is located in a stable mixed-use neighborhood on Elgin's westside. Vacant sites for redevelopment are scarce in this part of Elgin. In the surrounding census tract there is a diversity of incomes, but only 15% of the units in the market are considered affordable. The tract is considered an opportunity area by the Illinois Housing Development Authority. Located directly on a bus line, over 55,000 jobs are reachable within a 30 minute transit ride. Many amenities are walkable including schools, recreation, healthcare resources, and shopping.

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

Determination:

✓	Finding of No Significant Impact [24 CFR 58.40(g)(1); 40 CFR 1508.13] The project will not result in a significant impact on the quality of human environment
	Finding of Significant Impact

Approval Documents:

[Executed Signature page.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
Larkin PBVs	Public Housing	Project-Based Voucher Program

**Estimated Total HUD Funded,
Assisted or Insured Amount:** \$711,590.00

**Estimated Total Project Cost [24 CFR 58.2 (a)
(5)]:** \$17,530,497.00

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

Compliance Factors: 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)
STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR §50.4 & § 58.6		
Airport Hazards 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.
Coastal Barrier Resources Act 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 located in a county that does not contain CBRS units. Therefore, this project is in compliance with the Coastal Barrier Resources Act.
Flood Insurance Flood Disaster Protection Act of 1973 and National Flood Insurance Reform Act of 1994 [42 USC 4001-4128 and 42 USC 5154a]	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	The structure or insurable property is not located in a FEMA-designated Special Flood Hazard Area. While flood insurance may not be mandatory in this instance, HUD recommends that all insurable structures maintain flood insurance under the National Flood Insurance Program (NFIP). The project is

		in compliance with flood insurance requirements.
STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR §50.4 & § 58.5		
Air Quality Clean Air Act, as amended, particularly section 176(c) & (d); 40 CFR Parts 6, 51, 93	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	The project's county is in non-attainment status for the following: Ozone. This project does not exceed de minimis emissions levels or the screening level established by the state for the pollutant(s) identified above. The project is in compliance with the Clean Air Act.
Coastal Zone Management Act Coastal Zone Management Act, sections 307(c) & (d)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	This project is not located in or does not affect a Coastal Zone as defined in the state Coastal Management Plan. The project is in compliance with the Coastal Zone Management Act.
Contamination and Toxic Substances 24 CFR 50.3(i) & 58.5(i)(2)]	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Site contamination was evaluated as follows: ASTM Phase I ESA, NEPA Assist Analysis Report and CERCLIS map of Kane County. On-site or nearby toxic, hazardous, or radioactive substances that could affect the health and safety of project occupants or conflict with the intended use of the property were not found. The project is in compliance with contamination and toxic substances requirements. Radon levels in Kane County are consistently above the US EPA action level of 4 pCi/L. At this level or above, the EPA recommends taking corrective measures to reduce exposure to radon gas. The developer will test for radon and if the levels are higher than the EPA action level, the developer will install a radon mitigation system.
Endangered Species Act Endangered Species Act of 1973, particularly section 7; 50 CFR Part 402	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	This project will have No Effect on listed species based on the Chicago Regional Office of the FWS Section 7 Consultation system provided on their website. This project is in compliance with the Endangered Species Act.
Explosive and Flammable Hazards Above-Ground Tanks)[24 CFR Part 51 Subpart C	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	There are no current or planned stationary aboveground storage containers of concern within 1 mile of the project site. The project is in

		compliance with explosive and flammable hazard requirements.
Farmlands Protection Farmland Protection Policy Act of 1981, particularly sections 1504(b) and 1541; 7 CFR Part 658	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	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.
Floodplain Management Executive Order 11988, particularly section 2(a); 24 CFR Part 55	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	This project does not occur in a floodplain. The project is in compliance with Executive Order 11988.
Historic Preservation National Historic Preservation Act of 1966, particularly sections 106 and 110; 36 CFR Part 800	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Based on Section 106 consultation the project will have No Adverse Effect on historic properties. Of the eight tribes that have ties to Kane County none of them are concerned with the project site. The project will be monitored throughout its duration by this office. Upon satisfactory implementation of the buildings' rehabilitation according to the plans submitted, the project is in compliance with Section 106. None of the eight tribes that have an interest in Kane County have requested to be a part of the review.
Noise Abatement and Control Noise Control Act of 1972, as amended by the Quiet Communities Act of 1978; 24 CFR Part 51 Subpart B	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	A Noise Assessment was conducted. The noise level was acceptable: 62.42 db. See noise analysis. The project is in compliance with HUD's Noise regulation.
Sole Source Aquifers Safe Drinking Water Act of 1974, as amended, particularly section 1424(e); 40 CFR Part 149	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	The project is not located on a sole source aquifer area. The project is in compliance with Sole Source Aquifer requirements.
Wetlands Protection Executive Order 11990, particularly sections 2 and 5	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Based on the project description this project includes no activities that would require further evaluation under this section. The project is in compliance with Executive Order 11990.
Wild and Scenic Rivers Act Wild and Scenic Rivers Act of 1968, particularly section 7(b) and (c)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	This project is not within proximity of a NWSRS river. The project is in compliance with the Wild and Scenic Rivers Act.
HUD HOUSING ENVIRONMENTAL STANDARDS		
ENVIRONMENTAL JUSTICE		

Environmental Justice Executive Order 12898	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	No adverse environmental impacts were identified in the project's total environmental review. The project is in compliance with Executive Order 12898.
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Environmental Assessment Factors [24 CFR 58.40; Ref. 40 CFR 1508.8 &1508.27]

Impact Codes: An impact code from the following list has been used to make the determination of impact for each factor.

- (1) Minor beneficial impact
- (2) No impact anticipated
- (3) Minor Adverse Impact – May require mitigation
- (4) Significant or potentially significant impact requiring avoidance or modification which may require an Environmental Impact Statement.

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
LAND DEVELOPMENT			
Conformance with Plans / Compatible Land Use and Zoning / Scale and Urban Design	1	The proposed development meets several goals and objectives listed in the Comprehensive Plan. It provides new workforce housing and housing for people with disabilities. It represents a reinvestment in within an existing neighborhood, and it preserves a significant historic landmark giving it a new use. Proposal also consistent with the Plans vision to concentrate new multit-family developments located outside of downtown along established commercial corridors. The scale and urban design is consistent with the surrounding neighborhood and the historic buildings on site.	
Soil Suitability / Slope/ Erosion / Drainage and Storm Water Runoff	2	Proposed project site is suitable with respect to its size, shape, topography, watercourses, vegetation and existing improvements. The property slopes down gently to the south to the north. The developer will install new underground storm water detention facility under the new parking lot area, which would meet the requirements of the Kane County storm water ordinance.	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
LAND DEVELOPMENT			
Hazards and Nuisances including Site Safety and Site-Generated Noise	2	The Proposed project is within an existing residential and light commercial area. The noise generated by this project will be primarily from the construction phase. During the construction phase the project will have to conform to City of Elgin construction regulations and which will keep the site from creating safety hazards.	
Energy Consumption/Energy Efficiency	1	The project will be energy efficient in that instead of demolishing two historic buildings they will be rehabilitated and reused into apartments. This action will reduce the projects carbon footprint. The new construction buildings will have to meet current construction code energy efficiency rules.	
SOCIOECONOMIC			
Employment and Income Patterns	1	The proposed project will create 47 units of affordable multi-family housing. The proposed project could potentially create jobs during construction.	
Demographic Character Changes / Displacement	2	The project calls for 47 units to be constructed, this will not change the demographics of the area. Most potential residents already live in Elgin or Kane County. The project site is currently vacant so no one will be displaced.	
COMMUNITY FACILITIES AND SERVICES			
Educational and Cultural Facilities (Access and Capacity)	2	The on-site property management team will be staffed with a resident services coordinator. Other features of the development will include a community room, fitness center, library/study room and computer lab. The U46 school system is large and is accustomed to taking in new students, this development likely would have no more than 75 students that would be spread among the different grade levels. The project site is located across the street	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
LAND DEVELOPMENT			
		from Highland Elementary and Larkin High School is within walking distance to the project site. Multiple cultural facilities exist in Elgin and all would be accessible to the site's residents.	
Commercial Facilities (Access and Proximity)	2	The project site is within walking distance to many commercial facilities including a grocery store, laundromat, gas stations, drug stores, coffee shops and much more. See attached community amenity map.	
Health Care / Social Services (Access and Capacity)	2	AID, will have an office at the site and will provide needed services to the residents. 10 units will be reserved for residents with disabilities. Additionally the YWCA is within close proximity to the project site, along with clinics, doctor's offices and St. Joseph's hospital.	
Solid Waste Disposal and Recycling (Feasibility and Capacity)	2	Solid waste removal and recycling service is provided by the City of Elgin. The city will be able to provide these services to residents of the new development.	
Waste Water and Sanitary Sewers (Feasibility and Capacity)	2	Waste water and Sanitary Sewer is provided by the City of Elgin. The city will be able to provide these services to residents of the new development.	
Water Supply (Feasibility and Capacity)	2	Site is suitable for intended district with respect to the availability of adequate water. All existing utilities are available in adjacent streets and can provide adequate water and sanitary sewer needs for the development. All new service lines will be installed and a new looping water main would be constructed on the northern portion of the site to provide water service connections to the new buildings.	
Public Safety - Police, Fire and Emergency Medical	2	Police, Fire and Emergency medical service is provided by the City of Elgin.	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
LAND DEVELOPMENT			
Parks, Open Space and Recreation (Access and Capacity)	2	Developer will create greenspace in the center of the new housing. There are multiple parks and recreation opportunities within walking distance of the project site.	
Transportation and Accessibility (Access and Capacity)	2	Public transportation will be readily available for the new residents. Currently there is a PACE bus stop in front of the project site going west with the eastbound stop directly across the street. Bus routes on McLean Blvd. are within walking distance. The Metra system is also accessible in downtown Elgin. Public transportation in Elgin is accessible.	
NATURAL FEATURES			
Unique Natural Features /Water Resources	2	The project site is suitable in respect to the City's natural preservation standard. There are no significant natural features including topography, watercourses, vegetation, or existing improvements on the site.	
Vegetation / Wildlife (Introduction, Modification, Removal, Disruption, etc.)	1	There will be 11 trees taken down for the construction of the project, however 9 of those trees are considered undesirable. Approximately half of the trees are dying. Developer will install 64 new trees for shade and attractive foliage.	
Other Factors			

Supporting documentation

[February 27.19 City Council Approval.docx](#)

[1212 Larkin Community Amenities Map.pdf](#)

[1212 Larkin Ave Landscape Plans.pdf](#)

[1212 Larkin Emergency Service Map.docx](#)

Additional Studies Performed:

Field Inspection [Optional]: Date and completed
by:

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

ILSHPO- Anthony Rubano City of Elgin- Damir Latinovic, Planner, Christen Sundquist,
Preservation Planner IHDA- Amy Coyne Full Circle Development- Lindsey Haines
Additionally, the uploaded list of Agencies were consulted via their websites

List of Permits Obtained:

Public Outreach [24 CFR 58.43]:

The City of Elgin held a public hearing on the proposed project on February 4, 2019.
Also the IHDA, published a combined public notice (FONSI-NOIRROF) in the Daily
Herald. Kane County will also post a FONSI-NOIRROF at Elgin City Hall, at the Kane
County Government Center and on the Kane County Website.

[List of Sources.docx](#)

Cumulative Impact Analysis [24 CFR 58.32]:

The foreseeable cumulative impact of the project on the environment will be minimal.
The project will be developed in an urban area that is currently has a few buildings on
site. All City infrastructure is in place, schools, parks, and commercial areas. The
development will build a storm water detention hold tank, so as not to create
additional run-off. Most of the proposed developments potential residents already
live in Elgin or in nearby municipalities, and will not create a noticeable increase in
population. Additionally, the project will adaptively re-use buildings on the site,
instead of building more new buildings.

Alternatives [24 CFR 58.40(e); 40 CFR 1508.9]

None

No Action Alternative [24 CFR 58.40(e)]

Should no action be taken there would continue to be shortage of affordable housing
in Elgin, specifically for people that need supportive services to thrive independently.
No action would continue to perpetuate a crisis situation for people in need of
affordable housing.

Summary of Findings and Conclusions:

The proposed project would have multiple benefits that will out-weigh the minimal environmental impact the development will cause. The project would house and provide support services to those in need and would otherwise not be able to live on their own. This project provides services to disabled residents to develop life skills that will allow them to function independently and contribute to society. The project will have the cumulative benefit of creating decent, safe, and affordable multi-family housing

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
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Mitigation Plan

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

[Airports Map 2019.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)	

This project is located in a state that does not contain CBRA units. Therefore, this project is in compliance with the Coastal Barrier Resources Act.

Compliance Determination

This project is located in a county that does not contain CBRS units. Therefore, this project is in compliance with the Coastal Barrier Resources Act.

Supporting documentation

[Coastal Zone Map 2019.pdf](#)

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_ebe0e1c0-65f4-11e9-aa6c-001b21b31e35.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

Screen Summary

Compliance Determination

The structure or insurable property is not located in a FEMA-designated Special Flood Hazard Area. While flood insurance may not be mandatory in this instance, HUD

recommends that all insurable structures maintain flood insurance under the National Flood Insurance Program (NFIP). The project is in compliance with flood insurance requirements.

Supporting documentation

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):

Carbon Monoxide

Lead

Nitrogen dioxide

Sulfur dioxide

- ✓ Ozone
- Particulate Matter, <2.5 microns
- Particulate Matter, <10 microns

3. What are the *de minimis* emissions levels (40 CFR 93.153) or screening levels for the non-attainment or maintenance level pollutants indicated above

Ozone 100.00 ppb (parts per million)

Provide your source used to determine levels here:

This project is in compliance with the state of Illinois's SIP and will not exceed de minimis emissions levels assigned in the The EPA's greenbook.

4. Determine the estimated emissions levels of your project. Will your project exceed any of the de minimis or threshold emissions levels of non-attainment and maintenance level pollutants or exceed the screening levels established by the state or air quality management district?

- ✓ No, the project will not exceed *de minimis* or threshold emissions levels or screening levels.

Enter the estimate emission levels:

Ozone 8.43 ppb (parts per million)

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

Yes, the project exceeds *de minimis* emissions levels or screening levels.

Screen Summary

Compliance Determination

The project's county is in non-attainment status for the following: Ozone. This project does not exceed de minimis emissions levels or the screening level established by the state for the pollutant(s) identified above. The project is in compliance with the Clean Air Act.

Supporting documentation

[aqireport2018.pdf](#)

[Air Quality Memo-Project does not exceed de minimis emissions levels or the screening level established by the state.docx](#)

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

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 is not located in or does not affect a Coastal Zone as defined in the state Coastal Management Plan. The project is in compliance with the Coastal Zone Management Act.

Supporting documentation

[Coastal Zone Map 2019\(1\).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)

1. How was site contamination evaluated? Select all that apply. Document and upload documentation and reports and evaluation explanation of site contamination below.

- American Society for Testing and Materials (ASTM) Phase I Environmental Site Assessment (ESA)
- ASTM Phase II ESA
- Remediation or clean-up plan
- ASTM Vapor Encroachment Screening
- None of the Above

2. Were any on-site or nearby toxic, hazardous, or radioactive substances 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?)

- No

Explain:

The Phase I ESA did not identify any recognized environmental conditions. The CERCLIS map doesn't show any toxic, hazardous, or radioactive substances.

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

Yes

Screen Summary
Compliance Determination

Site contamination was evaluated as follows: ASTM Phase I ESA, NEPAssist Analysis Report and CERCLIS map of Kane County. On-site or nearby toxic, hazardous, or radioactive substances that could affect the health and safety of project occupants or conflict with the intended use of the property were not found. The project is in compliance with contamination and toxic substances requirements. Radon levels in Kane County are consistently above the US EPA action level of 4 pCi/L. At this level or above, the EPA recommends taking corrective measures to reduce exposure to radon gas. The developer will test for radon and if the levels are higher than the EPA action level, the developer will install a radon mitigation system.

Supporting documentation

[SEMS \(CERCLIS\) 2019.pdf](#)

[Radon Map of Kane.pdf](#)

[ECS Phase I ESA 03222019 Final.pdf](#)

[NEPAssist Analysis Complete.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.

- ✓ 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

Explain your determination:

Using the steps outlined in the Chicago Regional Office of the FWS Section 7 Consultation, I have determined that no endangered species will be affected by the proposed project.

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

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

Screen Summary

Compliance Determination

This project will have No Effect on listed species based on the Chicago Regional Office of the FWS Section 7 Consultation system provided on their website. This project is in compliance with the Endangered Species Act.

Supporting documentation

[Larkin Endangered Species Memo.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 a hazardous facility (a facility that mainly stores, handles or processes flammable or combustible chemicals), i.e. bulk fuel storage facilities, refineries, etc.?

No

Yes

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

No

Yes

3. Within 1 mile of the project site, are there any *current or planned* stationary aboveground storage containers:

- Of more than 100 gallon capacity, containing common liquid industrial fuels OR
- Of any capacity, containing hazardous liquids or gases that are not common liquid industrial fuels?

No

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

Yes

Screen Summary

Compliance Determination

There are no current or planned stationary aboveground storage containers of concern within 1 mile of the project site. The project is in compliance with explosive and flammable hazard requirements.

Supporting documentation

[NEPAssist Analysis Complete\(1\).pdf](#)

Are formal compliance steps or mitigation required?

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.)	7 CFR Part 658

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

[US Census map Urban area.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	24 CFR 55

1. Do any of the following exemptions apply? Select the applicable citation? [only one selection possible]

- 55.12(c)(3)
- 55.12(c)(4)
- 55.12(c)(5)
- 55.12(c)(6)
- 55.12(c)(7)
- 55.12(c)(8)
- 55.12(c)(9)
- 55.12(c)(10)
- 55.12(c)(11)

None of the above

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

[FIRMETTE_ebe0e1c0-65f4-11e9-aa6c-001b21b31e35.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.

Does your project occur in a floodplain?

No

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

Yes

Screen Summary

Compliance Determination

This project does not occur in a floodplain. The project is in compliance with Executive Order 11988.

Supporting documentation

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" http://www.access.gpo.gov/nara/cfr/waisidx_10/36cfr800_10.html

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)

✓ The eight tribes that have interest in Kane County Completed

✓ Other Consulting Parties

✓ Elgin Design Review Committee Completed

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

Federally recognized Native American tribes will be invited to consult on this project. The project does include significant ground disturbance including foundations, footings and grading. These activities will require inviting the Native American tribes with interests in Kane County to be invited to consult. As a new construction project, where there will be significant ground disturbance, Kane County invited the eight Native American tribes that have interest in Kane County for its historic and cultural significance to their history, to be a consulting party in a Section 106 review of the project property. None of the tribes have requested to be a part of the review. Property is on the National Register, using Historic Tax Credits and is an individually landmarked property by the City of Elgin. The Elgin Design Review Committee has jurisdiction over the property in addition to the County and the State preservation programs.

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

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:**

The APE is parcel on which the project site is located. The parcel is approximately 3.4 acres.

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.

Address / Location / District	National Register Status	SHPO Concurrence	Sensitive Information
1212 Larkin Ave., Elgin, IL 60123	Listed	Yes	✓ Not Sensitive

Additional Notes:

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

Yes

✓ 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

✓ No Adverse Effect

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

Document reason for finding:

The project will rehabilitate the historic buildings using the Sec. of the Interiors Standards and adaptively reuse the building and therefore preserving it. The new construction will not effect the character of the historic buildings.

Does the No Adverse Effect finding contain conditions?

Yes (check all that apply)

 No

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

Adverse Effect

Screen Summary**Compliance Determination**

Based on Section 106 consultation the project will have No Adverse Effect on historic properties. Of the eight tribes that have ties to Kane County none of them are concerned with the project site. The project will be monitored throughout its duration by this office. Upon satisfactory implementation of the buildings' rehabilitation according to the plans submitted, the project is in compliance with Section 106. None of the eight tribes that have an interest in Kane County have requested to be a part of the review.

Supporting documentation

[1212 Larkin Project Package.pdf](#)
[When to Consult with Tribes Under Section 106.pdf](#)
[Larkin Part 2 Amendment 1 NPS Response Full.pdf](#)
[NR nomination Larkin Home For Children.pdf](#)
[ILSHPO Approval Letter 1212 Larkin Avepdf.pdf](#)
[NR Listed 106 Memo.docx](#)

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

NOTE: HUD assistance to new construction projects is generally prohibited if they are located in an Unacceptable zone, and HUD discourages assistance for new construction projects in Normally Unacceptable zones. See 24 CFR 51.101(a)(3) for further details.

- Rehabilitation of an existing residential property

NOTE: For major or substantial rehabilitation in Normally Unacceptable zones, HUD encourages mitigation to reduce levels to acceptable compliance standards. For major rehabilitation in Unacceptable zones, HUD strongly encourages mitigation to reduce levels to acceptable compliance standards. See 24 CFR 51 Subpart B for further details.

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

4. Complete the Preliminary Screening to identify potential noise generators in the vicinity (1000' from a major road, 3000' from a railroad, or 15 miles from an airport).

Indicate the findings of the Preliminary Screening below:

There are no noise generators found within the threshold distances above.

- ✓ Noise generators were found within the threshold distances.

5. Complete the Preliminary Screening to identify potential noise generators in the

- ✓ Acceptable: (65 decibels or less; the ceiling may be shifted to 70 decibels in circumstances described in §24 CFR 51.105(a))

Indicate noise level here: 62.42

Based on the response, the review is in compliance with this section. Document and upload noise analysis, including noise level and data used to complete the analysis below.

Normally Unacceptable: (Above 65 decibels but not exceeding 75 decibels; the floor may be shifted to 70 decibels in circumstances described in §24 CFR 51.105(a))

Unacceptable: (Above 75 decibels)

HUD strongly encourages conversion of noise-exposed sites to land uses compatible with high noise levels.

Check here to affirm that you have considered converting this property to a non-residential use compatible with high noise levels.

Indicate noise level here: 62.42

Document and upload noise analysis, including noise level and data used to complete the analysis below.

**Screen Summary
Compliance Determination**

A Noise Assessment was conducted. The noise level was acceptable: 62.42 db. See noise analysis. The project is in compliance with HUD's Noise regulation.

Supporting documentation

[Noise worksheet.doc](#)

[DNL Calculator McLean - Larkin.pdf](#)

Are formal compliance steps or mitigation required?

Yes

✓ No

Sole Source Aquifers

General requirements	Legislation	Regulation
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.	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

No

2. Is the project located on a sole source aquifer (SSA)?

A sole source aquifer is defined as an aquifer that supplies at least 50 percent of the drinking water consumed in the area overlying the aquifer. This includes streamflow source areas, which are upstream areas of losing streams that flow into the recharge area.

No

Based on the response, the review is in compliance with this section. Document and upload documentation used to make your determination, such as a map of your project (or jurisdiction, if appropriate) in relation to the nearest SSA and its source area, below.

Yes

Screen Summary

Compliance Determination

The project is not located on a sole source aquifer area. The project is in compliance with Sole Source Aquifer requirements.

Supporting documentation

[Sole Source Aquifers Region V.pdf](#)

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

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

Yes

Screen Summary

Compliance Determination

Based on the project description this project includes no activities that would require further evaluation under this section. The project is in compliance with Executive Order 11990.

Supporting documentation

[Wetland Map.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. The project is in compliance with the Wild and Scenic Rivers Act.

Supporting documentation

[Scenic Rivers Map Arterials.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

No adverse environmental impacts were identified in the project's total environmental review. The project is in compliance with Executive Order 12898.

Supporting documentation

Are formal compliance steps or mitigation required?

Yes

No