

Environmental Assessment for HUD-funded Proposals

Recommended format per 24 CFR 58.36, revised March 2005

[Previously recommended EA formats are obsolete].



Project Identification: **MIRADOR LAS CASAS APARTMENT PROJECT
SAN JUAN, PR**

Preparer: **FÉLIX F. TORRES MONLLOR, PE, PA**

Responsible Entity: **PUERTO RICO DEPARTMENT OF HOUSING
CDBG-PR PROGRAM**

Month/Year: **NOVEMBER 6, 2021
January 28, 2022 Revision**

Environmental Assessment

Responsible Entity: PUERTO RICO DEPARTMENT OF HOUSING
[24 CFR 58.2(a)(7)] CDBG-DR PROGRAM

Certifying Officer: SALLY Z. ACEVEDO-COSME PRDOH
[24 CFR 58.2(a)(2)]

Project Name: MIRADOR LAS CASAS

Project Location: EDUARDO CONDE AVENUE, FINAL
SANTURCE WARD
SAN JUAN, PR 00915

Estimated Total Project Cost: Total Cost \$81,590,867.00
CDBG-DR \$60,658,700.00
Other \$27,999,686.00

B-17-DM-72-0001	\$0.00
B-18-DP-72-0001	\$60,658,700.00

Grant Recipient: Puerto Rico Housing Finance Authority
[24 CFR 58.2(a)(5)]

Recipient Address: 606 Barbosa Avenue, Río Piedras, PR 00918

Project Representative: ENG. FERNANDO SUMAZA / MS. ALEXANDRA DOMENECH

Telephone Number: (787) 831-6030

Email: FER@SUMAZA.ORG / ADOMENECH@SUMAZA.ORG

Conditions for Approval: (List all mitigation measures adopted by the responsible entity to eliminate or minimize adverse environmental impacts. These conditions must be included in project contracts and other relevant documents as requirements). [24 CFR 58.40(d), 40 CFR 1505.2(c)]

Conditions for approval and mitigation measures to be adopted throughout the construction are specified in the drawings, reports, and endorsement and/or recommendation letters herein presented (see supporting documents):

- ESA – PHASE I (ASTM 1527-13)
- Soil Study / Geotechnical Report
- Determinación de Exclusión Categórica
- Lead Paint Report
- Asbestos Mitigation Final Report
- Design Compliance Certification
- Autoridad de Acueductos y Alcantarillados (AAA)
- Autoridad de Energía Eléctrica (AEE / PREPA)
- Autoridad de Desperdicios Sólidos (ADS)
- State Historic Preservation Office (SHPO)
- Fish & Wildlife
- Negociado Telecomunicaciones de Puerto Rico (NETPR)
- Notification of Construction Permit
- Green Building Compliance (Design & Equipment / Appliances)
- Certification State Coastal Management
- Wetland Preliminary Jurisdiction Determination
- No Flood Certification

Additional Conditions:

1. Prior to start of construction work Developer must have final construction permit available with amended new construction budget total and EQB requirements or exclusions.
2. Implementation of 'Best Management Practices' as proposed by the US Department of Interior in their Blanket Clearance Letter dated September 20, 2020.

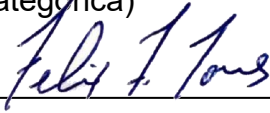
FINDING: [58.40(g)]

X

Finding of No Significant Impact

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

Supporting Document: 10 (Determinación de Cumplimiento Ambiental Vía Exclusión Categórica)



Date: November 6, 2021

Name/Title/Agency: FÉLIX F. TORRES MONLLOR, PE, PA

RE Approving Official Signature: 

Date: [February 1, 2022](#)

Sally Z. Acevedo Cosme- Interim Deputy Director, Permits and Environmental Compliance

Name/Title/Agency: PUERTO RICO HOUSING DEPATMRNT
CDBG-DR PROGRAM

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

Puerto Rico is short of suitable affordable housing for numerous low-income populations including, but not limited to, single headed households. Throughout the past decade PR has been wrought by an economic recession that has been further tainted by hikes in construction costs (that continue today), the implementation of new taxes, the degradation of the islands credit rating and new fiscal controls over government spending.

Furthermore, Hurricane Maria stormed through the island in September of 2017 damaging hundreds of thousands of homes along the way and between December 2019 through January 2020 a series of strong to moderate earthquakes damaged hundreds of housing and rental units in the Southwest region of the island. All together, these conditions have led to a shortage in affordable housing and present powerful obstacles to low-income families in their search for safe, sanitary, and secure homes.

The purpose of this endeavor is to assist in providing suitable affordable housing to low-income households, particularly targeting single headed households, in San Juan.

Supporting Document: **7** (Market Study)

Description of the Proposal: Include all contemplated actions that are either geographically or functionally a composite part of the project, regardless of the source of funding. [24 CFR 58.32, 40 CFR 1508.25]

The proposed project consists in the complete renovation of structures and site infrastructure of the existing multifamily Mirador Las Casas Apartments complex. Complex consists of twenty-one (21) three (3) story buildings that include, two (2), three (3), and four (4) bedroom units with a total of 294 units. Currently one (1) unit is being used as administration office and three (3) other units are used as Head Start facilities all are four (4) bedrooms, thus net units used for rental currently stands at two hundred and ninety (290). Renovation includes the construction of a new administration building yielding an additional rental unit for a total of two hundred and ninety-one (291) units. Existing support facilities include a sports court, an activity center, electronic library, maintenance building, and three hundred (300) surface parking spaces. The housing complex was built in the late 60's and never had a major renovation. At this point the complex is very outdated and all infrastructure is in dire need of being replaced and modernized, this became evident with the events of hurricane Maria and its aftermaths including the damage to the PR electrical grid.

This rehabilitation is essential to keep the property in safe, decent, and sanitary condition, along with the current design guides for compliance. All the systems, which include sewer, domestic water, and electric distribution, are obsolete. These do not comply with the current codes and are failing frequently. At any moment these systems may collapse despite administration's continuous maintenance and repairs. Also, the unit interiors, the site, and buildings will be greatly impacted. The rehabilitation work will be focused in including energy efficiency and resilient systems such as power generator, water cistern and lighting system that will operate with photovoltaic panels. These rehabilitation works will help the complex comply with FHA, ADA, UFAS and ANSI, as required by federal law. Energy efficient practices have been contemplated in the design.

The project is in full compliance with and in the best interest of San Juan's strategic goals to provide affordable and efficient dwellings to its population.

Contemplated actions include:

- Site Renovation of all Infrastructure, remodeling of existing supporting buildings and the construction of a new administration building. Compliance with accessibility by impacting all existing sidewalks, ramps, entrances, and parking area.
- Construction of new and existing buildings is reinforced concrete and masonry; sport's court will be completely rebuilt including a structural steel roof structure
- Existing infrastructure in service that will be impacted:
 - Electricity
 - Aqueduct & Potable Water Supply
 - Sanitary Sewer
 - Roads and Sidewalks
 - Telephone & Cable: Communications

Supporting Documents: 1 (Narrative), 18 (Municipal Endorsement)

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

The existing complex site is located within an impacted, mixed-use area of San Juan. It provides immediate access to public transportation and enjoys all infrastructure and services that could be provided by private and public entities.

The project has been vetted by local agencies and has been positively accepted by the Municipal Government. Puerto Rico's debt crisis accompanied by current economic trends and development efforts suggest that in the absence of the rehabilitation of this complex and the danger of the collapse of its outdated infrastructure could mean that over two hundred families could be at risk of losing their affordable housing.

Statutory Checklist: [24CFR §58.5]

Record the determinations made regarding each listed statute, executive order or regulation. Provide appropriate source documentation. Note reviews or consultations completed as well as any applicable permits or approvals obtained or required. Note dates of contact or page references. Provide compliance or consistency documentation. Attach additional material as appropriate. Note conditions, attenuation or mitigation measures required.

Factors Determination and Compliance Documentation

Historic Preservation [36 CFR 800]	<p>A letter from SHPO dated April 20, 2020, directed to Luis C. Fernández Trinchet, and for this project, states that SHPO has reached a conclusion of no historic properties affected.</p> <p>Furthermore, since this is an existing complex, and any excavation would be minimal and in already impacted areas the possibility that the project will impact any archaeological and/or historical resources is minimal.</p> <p>Given the previous, there is no anticipated adverse impact on archaeological resources. However, should any entity find any archaeological resources during the construction endeavor, all works must be immediately stopped, and the matter needs to be addressed as per the 'Consejo de Arqueología Terrestre', SHPO and/or any other agency with jurisdiction over the matter.</p> <p>Supporting Documents: 3 (SHPO)</p>
Floodplain Management [24 CFR 55, Executive Order 11988]	<p>This complex and its site are located outside the special AE FEMA flood zone per map and non-flood certification. FEMA MAP #72000C0370 Panel 370 of 2160 of November 18, 2009</p> <p>Supporting Document: 23 (FEMA Firmette & Non-Flood Certification)</p>

Wetlands Protection [Executive Order 11990]	<p>The project site is not located on any riparian nor wetlands. Furthermore, a permit won't be required as per Section 404 of the Clean Water Act for the project will not require the discharge of dredger or fill material into wetlands.</p> <p>Supporting Document: 24 (Wetlands Inventory)</p>
Coastal Zone Management Act [Sections 307(c), (d)]	<p>The project was referred to the Puerto Rico Planning Board with regards of possible coastal zone impact. On its November 9, 2020, the Puerto Rico Planning Board concluded that because this is a rehabilitation with limited new construction within existing footprint, the project is not expected to have any significant impact on natural resources, land, or waters of Puerto Rico. The Planning Board concluded that a review For Federal Consistency with the Puerto Rico Coastal Management Program is not Required.</p> <p>Supporting Document: 31 (PR Planning Board)</p>
Sole Source Aquifers [40 CFR 149]	<p>Puerto Rico is included in Region II of the USA EPA designated sole-source aquifer regions.</p> <p>The project is not served by designated sole-source aquifers nor is it located within a sole source aquifer watershed.</p> <p>Supporting Document: 26 (Region II-EPA MAPS)</p>
Endangered Species Act [50 CFR 402]	<p>The proposed site is in a densely populated, mixed-use urban landscape. The National Fish and Wildlife Service does not identify this area as a Wildlife Refuge. Furthermore, NO ADVERSE EFFECTS TO FEDERALLY LISTED SPECIES UNDER THE FWS JURISDICTION is anticipated as per Blanket Clearance Letter obtained from the US Department of Interior – FWS dated Sep 20, 2020.</p> <p>Supporting Document: 21, 27 (Wildlife Refuge Map-Fish & Wildlife, FWS Blanket Clearance Letter)</p>

<p>Wild and Scenic Rivers Act [Sections 7(b), (c)]</p>	<p>Puerto Rico has approximately 5,385 river miles. Only 8.9 miles of three rivers are designated as wild & scenic. The portions of these rivers that qualify under the act are located no less than 10 miles south-east of the project site. They will not be impacted by this project. See Wild Scenic Rivers System Map.</p> <p>Source: Source: www.rivers.gov, Enviromapper-Wild Scenic Rivers System Supporting Document: 28</p>
<p>Air Quality [Clean Air Act, Sections 176(c) and (d), and 40 CFR 6, 51, 93]</p>	<p>The Municipality of San Juan is currently listed as a nonattainment and maintenance area for Sulphur Dioxide (2010). Building rehab not believed to be a contributor, it is currently occupied.</p> <p>Source: Nonattainment Areas for Criteria Pollutants (Green Book) US EPA</p>
<p>Farmland Protection Policy Act [7 CFR 658]</p>	<p>The proposed project calls for rehabilitation construction in a developed lot that lies within a highly populated and developed, mixed use, urban area in San Juan.</p> <p>It does not include soils designated as 'Prime' for agricultural purposes.</p> <p>Supporting Document: 1, 29 (Narrative, Prime Farmlands)</p>
<p>Environmental Justice [Executive Order 12898]</p>	<p>The development is meant to serve the pressing need for affordable housing to in San Juan's low-income population and counts with the complete support from the Municipality. As evidenced by studies no significant adverse environmental effects are expected in the neighboring community, which includes low-income families.</p> <p>Supporting Document: 1,2,7,8,16,17,18,19 (Narrative, Phase I Environmental Study, Market Study, Appraisal Study, Asbestos Mitigation, Lead Paint Report, Municipal Endorsement, Contractor's Letter-Lead Mitigation)</p>

HUD Environmental Standards Determination and Compliance Documentation

Noise Abatement and Control [24 CFR 51 B]	<p>Results from a Noise Assessment rendered that the project location and neighboring conditions do not present noise levels that exceed HUD limits. Hence, no control measures are needed.</p> <p>Supporting Document: 6 (Noise Evaluation)</p>
Toxic/Hazardous/Radioactive Materials, Contamination, Chemicals or Gases [24 CFR 58.5(i)(2)]	<p>A Phase I Environmental Site Assessment dated October 28, 2021, and in conformance with the scope and limitations of ASTM E1527-13 determined that there were no recognized environmental conditions (RECs) associated with the property usage or on the project site.</p> <p>Project was built during the late 60's thus asbestos mitigation was completed. Lead base study was done and found issues with doors, shelving, and paint in one of the units. Lead mitigation will take place during rehabilitation work.</p> <p>Supporting Document: 2,16,17,19 (Phase 1, Final Asbestos Report, Lead Report, Contractor's Letter)</p>
Siting of HUD-Assisted Projects near Hazardous Operations [24 CFR 51 C]	<p>The proposal calls for a rehabilitation project for an existing complex in a populated, mixed-use urban area within San Juan's urban district.</p> <p>This project will not expose either people or buildings to additional hazards.</p> <p>Supporting Document: 1, 2 (Narrative, Phase 1)</p>
Airport Clear Zones and Accident Potential Zones [24 CFR 51 D]	<p>The nearest airport runway from the site is just over a mile away.</p> <p>The airport is the Luis Muñoz Marín International Airport, which is a joint civilian / military airport. Project falls within Accident Prone Zone per Airport's Operators email, less than 15,000 feet from runways for military requirements. Following A-28 Airport Checklist #3, project is not new construction. FD-1136 (A-28) is not considered major rehabilitation work (greater than 75% of replacement cost), will not increase density (existing number of units to remain the same), does not introduce explosives, flammable, or toxic materials to the area. Therefore, per check list A-28 #3 project is not a major project and can be assisted with HUD funds. A Noise Evaluation rendered that airport related noise is much lower than HUD limits.</p> <p>Supporting Document: 6,32,33 (Noise Evaluation, Airport's Operator email, Replacement Cost Analysis)</p>

Environmental Assessment Checklist

[Environmental Review Guide HUD CPD 782, 24 CFR 58.40; Ref. 40 CFR 1508.8 & 1508.27]

Evaluate the significance of the effects of the proposal on the character, features and resources of the project area. Enter relevant base data and verifiable source documentation to support the finding. Then enter the appropriate impact code from the following list to make a determination of impact. **Impact Codes:** (1) - No impact anticipated; (2) - Potentially beneficial; (3) - Potentially adverse; (4) - Requires mitigation; (5) - Requires project modification. Note names, dates of contact, telephone numbers and page references. Attach additional material as appropriate. Note conditions or mitigation measures required.

Land Development	Code	Source or Documentation
Conformance with Comprehensive Plans and Zoning	1	<p>The lot under consideration is designated within an R-3 zone. Complex has been under residential use since it was built in late 60's</p> <p>Supporting Document: 12 (Zoning Map-Municipality of San Juan, Panel 5E)</p>
Compatibility and Urban Impact	2	<p>The project lies within a populated area of mixed occupancies. Single and multi-family homes, commercial, healthcare, industrial and institutional facilities are found throughout the immediate vicinity. The project also conforms to the best interests of a population that are in dire need of affordable housing and with the Municipality's plans.</p> <p>Furthermore, the developer states that the design, has considered compliance for green building under HUD green building retrofit check list, and complex will now comply with FHA, ADA, UFAS and ANSI, as required by federal law, will keep existing public open areas, and new landscaping is part of the design. Height of buildings will not be increased.</p> <p>Supporting Document: 1, 11, 18 (Narrative, Drawings, Municipal Endorsement,)</p>
Slope	1	<p>Existing site is flat. It is not within an area of potential landslides.</p> <p>No major earthwork is required for this project.</p> <p>Supporting Document: 1, 11, 18 (Narrative, Municipal Endorsement, Drawings)</p>

Erosion	1	<p>A potential for some construction related erosion always exists but due to the minimal amount of earth work in this project nothing of impact is expected. Any erosion risk can be mitigated by good construction practices and through strict compliance with EQB requirements. There is no anticipated adverse effect on erosion expected because of the development of this project.</p> <p>Supporting Document: 1, 11 (Narrative, Drawings)</p>
Soil Suitability	1	<p>Investigation of subsoil reveals that mitigation of soil conditions will be required for new structures. Structural design implemented soil study recommendations.</p> <p>Supporting Document: 4, 30 (Soil Study, Structural Engineer Letter)</p>
Hazards and Nuisances including Site Safety	1	<p>The project site does not present any construction logistic difficulties to the contractor. Hence, the contractor should not be facing any safety, hazard, or nuisances other than those typical to construction projects.</p> <p>Nevertheless, the contractor must endeavor to provide a safe environment, on and off-site, throughout the construction. This includes compliance with all safety and environmental measures established by, but not limited to, OSHA, EPA and the DNRE.</p> <p>Supporting Document: 11 (Drawings)</p>
Energy Consumption	1	<p>The demand for electricity generated by the project won't require a major expansion of power facilities nor would it have any anticipated adverse effects.</p> <p>The project has been endorsed by the AEE.</p> <p>Furthermore, the design has incorporated the best practices for energy efficiency and is adhering to the compliance for green building under HUD green building retrofit check list.</p> <p>Supporting Document: 1, 14, 10 (Narrative, AEE. HUD Green Building Retrofit Checklist)</p>

Noise - Contribution to Noise Levels	1	<p>The proposed project does not increase the number of existing units and is already part of the existing neighborhood, therefore, the noise contribution to the community produced by the proposed project will be no different to the existing noise level.</p> <p>With respect to construction noise, it must be mitigated by standard procedures and measures as requested by Puerto Rico's environmental quality board and required in their 'Reglamento para el Control de la Contaminación por Ruido'.</p> <p>Supporting Document: 1 (Narrative)</p>
Air Quality Effects of Ambient Air Quality on Project and Contribution to Community Pollution Levels	1	<p>Given that the site lies within the built environment of the city of San Juan, the proposed project won't have a significant impact on existing community airpollution levels.</p> <p>With respects to the construction, the contractor must endeavor to minimize construction dust from becoming a nuisance to the neighborhood and environment through mitigation measures that include but are not limited to DNRE requirements and maintained throughout the construction activity.</p> <p>Supporting Document: 11 (Drawings)</p>
Environmental Design Visual Quality - Coherence, Diversity, Compatible Use and Scale	2	<p>The built environment surrounding the proposed project site serves the residential, commercial, and institutional needs of San Juan. Existing architecture is composed of a blend of, modern, and contemporary structures of varying scale and aesthetics. The rehabilitation will involve façade improvements and modernization of all the infrastructure. This will help improve visual quality in the area and the improved infrastructure will help the efficiency and thus help reduce the load in the area.</p> <p>This project is an existing complex within a residential zoning thus there are no issues about coherence, diversity, or compatibility.</p> <p>Supporting Document: 1,18,11(Narrative, Municipal Endorsement, Drawings)</p>

Socioeconomic	Code	Source or Documentation
Demographic Character Changes	2	<p>The project is within a mixed-use, populated sector of San Juan. Rehabilitation will contribute to the Municipalities ongoing effort to attend the demand for modern affordable housing as well as to attract and maintain a steady population in this district.</p> <p>Supporting Document: 1, 18, 7 (Narrative, Municipal Endorsement, Market Study)</p>
Displacement	2	<p>There will be neither displacement nor adverse socioeconomic effects since the project is an existing complex to be rehabilitated to comply with HUD accessibility and green energy requirements.</p> <p>Supporting Document: 1, 18, 7 (Narrative, Municipal Endorsement, Market Study)</p>
Employment and Income Patterns	2	<p>The rehabilitation will help modernize the complex and avoid obsolescence and possible lower demand of tenants due to failing infrastructure. This will help maintain current administration and maintenance jobs & contracts.</p> <p>In addition, maintaining high tenant demand maintains the market for the neighboring hospital and commercial facilities. Hence, avoids potentially deteriorating regional commerce with lower tenant demand.</p> <p>Supporting Document: 1, 18, 7 (Narrative, Municipal Endorsement, Market Study)</p>

**Community Facilities
and Services**

	Code	Source or Documentation
Educational Facilities	2	<p>The project's proposed tenant base is that of the single head households' families. Hence, there is a need for educational facilities, but existing facilities should be adequate since the housing complex is currently occupied.</p> <p>Supporting Document: 1, 7 (Narrative, Market Study)</p>
Commercial Facilities	2	<p>There are numerous small and large-scale mixed-use commercial facilities throughout the Santurce ward, which will keep benefiting from the existing client base and avoid the risk of diminishing tenant demand.</p> <p>Supporting Document: 1, 7 (Narrative, Market Study)</p>
Health Care	2	<p>Day to day medical services and two pharmacies are available within a 1-mile radius from the site</p> <p>Source: Google Maps</p>
Social Services	2	<p>The project intends to appease the current excess demand for affordable housing single-headed households in San Juan. Qualified participants will receive the financial support for suitable housing within a planned community. The effort conforms to the best interest of the Municipality and its population.</p> <p>Supporting Document: 1, 7, 18 (Narrative, Market Study, Municipal Endorsement)</p>
Solid Waste	1	<p>Existing solid waste removal services is available to the existing complex. The proposed project calls for the adaptive reuse of the existing structure.</p> <p>Recycling should be implemented and enforced as per standards set by the Solid Waste Authority (Autoridad de Desperdicios Sólidos' – ADS).</p> <p>Supporting Document: 20 (Recycling Plan)</p>

Wastewater	1	<p>The project is currently served by the existing infrastructure provided by the local water and sewer service company known as 'La Autoridad de Acueductos y Alcantarillados' (aka AAA). Internal site infrastructure will be retrofitted to modern standards.</p> <p>The AAA has endorsed the project.</p> <p>Supporting Document: 13 (AAA)</p>
Storm Water	1	<p>According to the designer, the design does not increase the current storm sewer flow.</p> <p>Supporting Document: 5, 11 (Designer's letter, Civil Drawings)</p>
Water Supply	1	<p>The project currently served by the existing infrastructure provided by the local water and sewer service company known as 'La Autoridad de Acueductos y Alcantarillados' (aka AAA).</p> <p>The AAA has endorsed the project.</p> <p>Supporting Document: 13 (AAA)</p>
Public Safety - Police	1	<p>A State Police Station is located a mere 100m (2-minute walk) from the project.</p> <p>Source: Google Maps, Google Earth</p>
Fire Department	1	<p>A fire station is located within a mile.</p> <p>Source: Google Maps, Google Earth</p>

- Emergency Medical	1	<p>Day to day medical services and two pharmacies area within a 1-mile radius from site.</p> <p>Source: Google Maps</p>
Open Space and Recreation - Open Space	2	<p>The San Juan Municipality is densely populated. However, the existing complex has features with open spaces and a sports court. These areas will be impacted including landscaping, new playgrounds & equipment, and the demolition and reconstruction of the sports court.</p> <p>The following are located within a mile and a half radius from the site: Softball Park, basketball court, soccer field, and several restaurants.</p> <p>Source: Google Maps</p>
- Recreation	2	<p>The following are located within a two-mile radius from the site: Public beaches, restaurants, shopping center (Norte Shopping Center). José Miguel Agrelot Coliseum.</p> <p>Source: Google Maps</p>
- Cultural Facilities	2	<p>The following are located within a two-mile radius from the site: Centro de Bellas Artes de Santurce (Performing Arts Center), Cultural Centers, various sports facilities, various universities, and Santurce's plaza and marketplace.</p> <p>Source: Google Maps</p>
Transportation	2	<p>This area is served by Metropolitan Bus Authority (AMA). Puerto Rico's public transportation in the metropolitan area.</p> <p>Rehabilitation includes the construction of a bus stop for the Metropolitan Bus Authority System.</p> <p>7,11 (Narrative, Drawings)</p>

Natural Features	Source or Documentation	
Water Resources	1	<p>No natural water sources will be used.</p> <p>The project is currently served by the existing infrastructure provided by the local water and sewer service company known as 'La Autoridad de Acueductos y Alcantarillados' (AAA).</p> <p>The AAA has endorsed the project.</p> <p>Supporting Document: 13, 26 (AAA, Region II SSA)</p>
Surface Water	1	<p>According to project designer the rehabilitation design does not increase the storm sewer flow which means that the current system can serve the project.</p> <p>Supporting Document: 5, 11 (HH Designer's Letter, Civil Drawings)</p>
Unique Natural Features and Agricultural Lands	1	<p>The proposal is for a rehabilitation project of an existing multifamily complex. The site is within a densely populated urban landscape. There are no unique natural features or agricultural lands within or adjacent to complex site.</p> <p>Supporting Document: 1, 29 (Narrative, Prime Farmlands Map)</p>
Vegetation and Wildlife	1	<p>The proposal is for a rehabilitation project of an existing multifamily complex. The site is a within a densely populated urban landscape. Existing vegetation will be enhanced by a new landscaping design. There are no anticipated adverse effects on vegetation and wildlife.</p> <p>Supporting Document: 1, 21, 27 (Narrative, FWS, Wildlife Refuge Map)</p>

Other Factors		Source or Documentation
Flood Disaster Protection Act [Flood Insurance] [§58.6(a)]	1	<p>The site is outside Zone AE defined by FEMA as an “area subject to inundation by the 1-percent-annual-chance flood event determined by detailed methods.” Site is completely within Zone X. FEMA Map #72000C0370 Panel 370 of 2160 November 18, 2009.</p> <p>No Mandatory flood insurance purchase is required.</p> <p>Supporting Document: 23 (FEMA Firmette)</p>
Coastal Barrier Resources Act/ Coastal Barrier Improvement Act [§58.6(c)]	1	<p>The project site is located over 1 mile from the nearest coastline. The distance from the project to the coast and infrastructure that lie between the two serve as a buffer protecting the coast from the construction endeavor and future project use.</p> <p>The Coastal Barrier Resource System Mapper further confirms that the site is not identified as a ‘protected area.</p> <p>Supporting Document: 25 (CBRS)</p>
Airport Runway Clear Zone or Clear Zone Disclosure [§58.6(d)]	1	<p>The nearest airport runway from the site is just over a mile away.</p> <p>The airport is the Luis Muñoz Marín International Airport, which is a joint civilian / military airport. Project falls within Accident Prone Zone per Airport’s Operators email, less than 15,000 feet from runways for military requirements. Following A-28 Airport Checklist #3, project is not new construction, the only new structure being built is a one (1) story administration building within the existing developed foot print that does not increase tenant availability, not considered major rehabilitation work (greater than 75% of replacement cost), will not increase density (existing number of units to remain the same), does not introduce explosives, flammable, or toxic materials to the area. Therefore, per check list A-28 #3 project is in compliance with DoD guidelines and can be assisted with HUD funds.</p> <p>A Noise Evaluation rendered that airport related noise is much lower than HUD limits.</p> <p>Supporting Document: 6,32,33 (Noise Evaluation, Airport’s Operator email, Replacement Cost Analysis)</p>
Other Factors		

Summary of Findings and Conclusions

ALTERNATIVES TO THE PROPOSED ACTION

Alternatives and Project Modifications Considered [24 CFR 58.40(e), Ref. 40 CFR1508.9]

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

The Municipality is interested in residential developments for affordable housing within its urban limits. Given the character of the community within which it lies, the available infrastructure, access to principal roads and highways, and its readily accessible location, the site is perfectly suitable for the intended use.

Alternatives:

1. Not doing the rehabilitation project or doing a partial rehabilitation would mean that the complex's infrastructure could eventually collapse causing unsafe conditions and the relocation of the current tenants. This would result in the reduction of the number of apartments available for affordable housing in San Juan. This would be inconsistent with the municipality's interest in providing for the high demand for affordable housing.
2. A 2nd option would be the demolition of the existing structures and building from the ground up. This alternative would result in an increment of costs, an excessive amount of construction debris, and the relocation of tenants to other affordable housing units which would create a further shortage while project is under construction. We estimate additional project completion time would be two to three years compared to the rehabilitation. Clearly this alternative would not be feasible.

Supporting Document: 7, 18

No Action Alternative [24 CFR 58.40(e)]

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

No action would entail putting tenants at risk. This project is clearly in tenants and Municipality's best interest to create affordable, safe, and modern affordable housing.

Mitigation Measures Recommended [24 CFR 58.40(d), 40 CFR 1508.20] (Recommend feasible ways in which the proposal or its external factors should be modified in order to minimize adverse environmental impacts and restore or enhance environmental quality.)

Conditions for approval and mitigation measures to be adopted throughout the construction are specified in the drawings, reports, and endorsement and/or recommendation letters herein presented (see supporting documents):

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- Negociado Telecomunicaciones de Puerto Rico (NETPR)
- Notification of Construction Permit
- Green Building Compliance (Design & Equipment / Appliances)
- Certification State Coastal Management
- Wetland Preliminary Jurisdiction Determination
- No Flood Certification

Additional Conditions:

4. Implementation of 'Best Management Practices' as proposed by the US Department of Interior in their Blanket Clearance Letter dated September 14, 2020.
5. Contractor must comply with DENR.

Supporting Documents

1. Project Narrative
2. Phase 1 Environmental Site Assessment
3. State Historic Preservation Office (SHPO) - Letter
4. Soil Study / Geotechnical Report
5. Designer's Hydraulic & Hydrological Letter
6. Noise Assessment
7. Market Study Report
8. Appraisal Report
9. Recomendación Ambiental (DEC) Determinación de Cumplimiento Ambiental
10. HUD Green Building Retrofit Check List
11. Drawings
12. Zoning Map
13. Autoridad de Acueductos y Alcantarillados (AAA)
14. Autoridad de Energía Eléctrica (AEE / PREPA)
15. Notificación de Aprobación Permiso de Construcción/
16. Asbestos Mitigation Final Report
17. Lead Report
18. Municipal Endorsement
19. Contractor's Letter Regarding Lead Paint Mitigation
20. Submitted Recycling Plan - Solids Waste Authority / Autoridad de Desperdicios Sólidos (ADS)
21. US Dept of Interior - FWS
22. NETPR - Telecommunications
23. FEMA Map (Firmette) – Flood
24. Wetlands Inventory
25. Coastal Barriers
26. Sole Source Aquifers
27. Wildlife Refuge Map
28. Scenic Rivers
29. Prime Farmlands
30. Structural Engineer Letter – Compliance Soil Study
31. PR Planning Board Letter – Federal Consistency Certification
32. Airport Operator Communication – Accident Clear Zone
33. Appraisal Determination Regarding % of Rehabilitation Replacement Cost

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