



**U.S. Department of Housing and Urban
Development**
451 Seventh Street, SW
Washington, DC 20410
www.hud.gov
espanol.hud.gov

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

Project Information

Project Name: Grim-Hotel

HEROS Number: 900000010021960

Responsible Entity (RE): TEXARKANA, PO Box 1967 Texarkana TX, 75504

RE Preparer: Daphnea Ryan

State / Local Identifier:

Certifying Officer: David Orr

Grant Recipient (if different than Responsible Entity):

Point of Contact:

Consultant (if applicable):

Point of Contact:

Project Location: 301 N. State Line Ave., Texarkana, TX 75501

Additional Location Information:

This site is on the NW corner of N. State Line Avenue and W. 3rd Street

Direct Comments to: dryan@txkusa.org
P.O. Box 1967
Texarkana, TX 75504
ATTN: Daphnea Ryan

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

Redevelopment of the currently vacant Hotel Grim into Grimm Lofts, a mixed-use development with approximately 98 loft apartments with at least 20% identified for low/moderate income persons, with retail space on the ground level. Total project cost is estimated at \$14,700,000.00. Funding sources for this project include Federal Historic Tax Credits - \$2,337,096.00; State Historic Tax Credits \$2,419,582.00; Federal Low-Income Housing Tax Credits \$4,253,828.00, developer bank debt \$3,082,000.00, Section 108 Loan - \$1,492,000.00, EPA Brownfields Revolving Loan - \$650,000.00, and a City loan in the amount of \$260,000.00. Project redevelopment is slated to begin late Summer/early Fall 2017 and is estimated to take approximately 18 months to complete. EPA Brownfields Revolving Loan in the amount of \$650,000.00 will cover the cost to abate asbestos, lead-based paint, and to re-encapsulate minor soil contamination found during the Phase II Environmental Assessment.(current parcel is encapsulated with concrete; however, this concrete is aging, cracked, and will be re-encapsulated to meet current laws/regulations.

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

Grimm Lofts, LLC is seeking to redevelop the long-time vacant Grim Hotel into a mixed use development with loft apartments on floors 2-9 and retail space on the ground level. At least 20% of the residential units will be identified for low/moderate income persons. Grimm Lofts, LLC desires to redevelop this site, thereby, bringing much needed residential density to our downtown area. The City strives to redevelop our downtown into a thriving community and this project will work as a catalyst for this endeavor.

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

The existing structure is conveniently located within walking distance to Amtrack, city public transportation, parking for private vehicles, medical services, and emergency services. The site sits across the street from the Texarkana Museum System, and within close proximity of the Texarkana Children's Museum, Perot Theatre, Texarkana Regional Arts and Humanities Council; Texarkana Texas Farmers Market, Kidtopia Park, and the Public Library. This site is currently blighted and will most likely continue to be that without the efforts of this project. Housing and other development is greatly needed in the downtown area in order for overall redevelopment efforts to be successful.

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

[Location Map.jpg](#)

[Grim Pic 2.jpg](#)

[Grim Pic 1.jpg](#)

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:

[20170608150029.pdf](#)

7015.15 certified by Certifying Officer on:

7015.16 certified by Authorizing Officer on:

Funding Information

Grant Number	HUD Program	Program Name	Funding Amount
B16-MC-48-1000	CPD	Community Development Block Grants (Section 108 Loan Guarantee)	\$1,492,000.00

Estimated Total HUD Funded Amount: \$1,492,000.00

This project anticipates the use of funds or assistance from another federal agency in addition to HUD in the form of:

Estimated Total Project Cost [24 CFR 58.2 (a) (5)]: \$14,700,000.00

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 nearest airport is 2.78 miles from this site. 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 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.
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 or air quality management district is in attainment status for all criteria pollutants. 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. This site is located 220+ miles from the nearest Coastal Zone Management area, which is in Orange County, Texas. 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 checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Site contamination was evaluated as follows: ASTM Phase I ESA, ASTM Phase II ESA. Findings of the Phase II are as follows: Mercury, arsenic, and lead concentrations exceeded the TCEQ Action Levels of 0.04, 5.9, and 15 mg/kg, respectively, in the near surface soil samples of B-2 (1-2 feet below ground surface, or bgs) and B-4 (1-2 feet bgs). Mercury was detected at concentrations of 0.115 mg/kg and 0.412 mg/kg, respectively; Arsenic exceeded action levels in B-4 (1-2 feet bgs) only at a concentration of 8.88 mg/kg; and lead exceeded action levels at concentrations of 373 and 1,400 mg/kg, respectively. Other metal constituents were not detected at concentrations exceeding the respective TCEQ Action Levels. TPH, VOCs, SVOCs, herbicides and pesticides were not detected above their respective action levels and/or the laboratory detection limit in the soil samples. Groundwater Lead was detected in concentrations above the TCEQ Action Level of 0.015 mg/l in the four groundwater samples collected for laboratory analysis. Concentrations were detected in MW-1 through MW-4 at 0.0928, 0.0638, 0.0583, and 0.0656

		<p>mg/l, respectively. TPH, VOCs, SVOCs, herbicides and pesticides were not detected above their respective action levels and/or the laboratory detection level in the groundwater samples. Groundwater was encountered at approximately 17 to 23 bgs. The groundwater flow direction across the site appears to flow inward with a slight northeast flow component. Asbestos Containing Material was found in Aircell thermal system insulation (TSI) insulated piping on each floor; 12" x 12" vinyl asbestos floor tile (VAT) on the first floor; 9" x 9" vinyl asbestos floor tile (VAT) on the second floor through the eighth floor; Roof mastic on the roof; Black pipe insulation above basement hallway between HVAC shop and pump maintenance shop. Lead-based paint was found in Pink paint in lobby entrance; brown paint in lobby entrance and trim throughout hotel; green paint in south store rooms on first floor; blue in north portion of lobby; and white paint on plaster walls throughout hotel. The adverse environmental impacts can be mitigated. With mitigation, identified in the mitigation section of this review, the project will be in compliance with contamination and toxic substances requirements.</p>
<p>Endangered Species Act 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>This project has been determined to have No Effect on listed species. There are three birds listed, the Least Tern, Red Knot, and Piping Plover. The Red Knot and Piping Plover are only affected by Wind Energy Projects and this project does not include Wind Energy. The Least Tern habitat is sandy, sparsely vegetated beaches, salt flats, etc. along waterways and this project is not located in or near the Least Tern habitat area. This project is in compliance with the Endangered Species Act without mitigation.</p>

<p>Explosive and Flammable Hazards Above-Ground Tanks)[24 CFR Part 51 Subpart C</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<p>There is a current or planned stationary aboveground storage container of concern within 1 mile of the project site. A study was performed by ERI Consulting, which concluded that the Separation Distance from the project is acceptable. The project is in compliance with explosive and flammable hazard requirements.</p>
<p>Farmlands Protection 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. Land use for this area is Central Business and does not contain any open land. The project is in compliance with the Farmland Protection Policy Act.</p>
<p>Floodplain Management Executive Order 11988, particularly section 2(a); 24 CFR Part 55</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<p>This project does not occur in a floodplain. The project is in compliance with Executive Order 11988.</p>
<p>Historic Preservation National Historic Preservation Act of 1966, particularly sections 106 and 110; 36 CFR Part 800</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<p>Based on Section 106 consultation the project will have No Adverse Effect on historic properties. Conditions: Project plans and specifications are reviewed and approved through the Texas Historical Commission Historic Tax Credit Program. Unless the Historic Tax Credit Program staff does not get the opportunity to review the proposed rehabilitation, or the proposal changes, the project may proceed without further Section 106 consultation.. The project is in compliance with Section 106.</p>
<p>Noise Abatement and Control Noise Control Act of 1972, as amended by the Quiet Communities Act of 1978; 24 CFR Part 51 Subpart B</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<p>The project is modernization/rehabilitation of an existing vacant former Hotel and extended stay efficiency rooms. A Noise Assessment was conducted for this site. The inputs described in this report for the assessment site at 301 N. Stateline Ave. were modeled using the HUD DNL Calculator. The combined DNL for all road and rail sources was 62.7 dB. This falls below the HUD threshold of 65 dB. The assessment site has an acceptable day/night noise environment. See</p>

		attached.. The project is in compliance with HUD's Noise regulation without mitigation.
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 nearest Sole Source Aquifer Area is 143.6 miles. 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	The project will not impact on- or off-site wetlands. This site is located in our downtown district that is fully developed and is not near a wetland. 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 nearest NWSRS is 60.3 miles away. 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	Adverse environmental impacts are not disproportionately high for low-income and/or minority communities. In addition, the environmental impacts found will be abated by the developer utilizing EPA Brownfields Funds; thereby eliminating the adverse environmental impacts. The project is in compliance with Executive Order 12898.

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	1	The City is in the final stages of updating our	No

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
LAND DEVELOPMENT			
/ Compatible Land Use and Zoning / Scale and Urban Design		Comprehensive Plan and this project is in line with our short and long term goals for revitalizing downtown. This project is compatible with our current land use and zoning. It is zoned Central Business District, which includes mixed-use projects. The project compliments the existing land uses of the adjacent and surrounding properties. Scale and Urban Design will be favorably impacted by the redevelopment of a long-term vacant, distressed building. There will be no natural land features removed, as the entire parcel is currently built or covered in concrete/asphalt. The project is rehabilitation of an existing 8-floor structure; therefore, the will not alter the overall surrounding built environment with regard to overall scale, size and mass. Historic integrity will be maintained as this project is also utilizing Historic Tax Credits. The building footprint will remain the same and will not affect the natural elements. The project will have a positive impact on the built environment with historic elements of the building being maintained/rehabilitated. Visual aspects from street view will include large retail windows that will be dressed to appeal. The community has supported this project as it has moved forward over the past several years and express the benefit of downtown revitalization. This project will increase street level activity and will be a catalyst for more redevelopment of downtown vacant properties. This project conforms to locally adopted design guidelines.	mitigation needed
Soil Suitability / Slope/ Erosion / Drainage and Storm Water Runoff	2	Storm Water Runoff This project is the redevelopment of an 8-story existing structure in a completely developed downtown area. The entire parcel is encapsulated with concrete or pavement. Redevelopment of this project will not have an impact on storm water runoff.	No mitigation needed

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
LAND DEVELOPMENT			
		<p>Environmental professionals conducted a Phase II ESA with the findings of minimal soil and ground water contaminants as follows: Mercury, arsenic, and lead concentrations in the soil in the near surface soil samples 1-2 feet below ground surface. Mercury was detected at concentrations of 0.115 mg/kg and 0.412 mg/kg; Arsenic was only at a concentration of 8.88mg/kg and Lead concentrations were at 373 and 1400 mg/kg. TPH, VOCs, SVOCs, herbicides and pesticides were not detected in the soil. About groundwater, Lead was detected in concentrations of 0.015 mg/l and no TPH, VOCs, SVOCs, herbicides and pesticides were not detected in groundwater samples. This project will not affect any soil that is better suited for natural resource management activities (farming, forestry, unique natural area preservation), as it is part of our downtown built environment. This site is not on a slope. There are no issues with erosion since the project is in a downtown built environment. There are no visual indications of filled ground, active rills, or gullies on site. This site has been developed since the early 1900s. City Engineer, Dusty Henslee advises that the existing storm water disposal system is adequate to continue processing the storm water runoff at this site. The proposed project will not be affected by these facilities, as they are already in place and the project is redevelopment an existing structure. The daily treatment capacity of the wastewater treatment plant this location flows to is 18 MGD. There is a six inch (6") sanitary sewer main that serves this location. The projected daily wastewater flow from the Grimm Lofts Project would be approximately 24,500 gallons per day. The peak flow rate is projected to be approximately 68 gallons per minute (GPM). The capacity of a six-inch gravity sewer main</p>	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
LAND DEVELOPMENT			
		is 196 GPM.) A construction storm water permit will be required during construction. The type is determined by the amount of soil disturbance (Large, Small, Special). Given the scope of this project, this would be classified was a Small Site. It is not anticipated that the project site will experience a negative affect by drainage and storm water conditions. City Engineers will ensure through the permitting process that the design will include measures to overcome potential runoff problems prior to a permit being issued and will ensure this development does not negatively affect any other properties.	
Hazards and Nuisances including Site Safety and Site-Generated Noise	2	Site safety is a top priority for the on-site crews as well as the public and all applicable law will be followed. A study of above ground storage tanks was conducted and the project meet the acceptable separation distance requirements. There are no explosive or flammable substances on or near this site. A noise assessment study was conducted by ERI Consulting as well, and the site is not adversely affected by noise. Construction on the site is not expected to have a negative impact on the community and hours of construction will be limited to the hours of 7:00 a.m. and 6:00 p.m. Monday through Saturday, with no work on Sundays. The project is not expected to be affected by any natural or man-made hazards/nuisances.	No mitigation needed
Energy Consumption/Energy Efficiency	2	Redevelopment of an existing structure saves cost as well as reducing energy consumption during construction. The site is in close proximity to transit, shopping services and employment locations. As in most downtown areas, parking is limited, which will encourage carpooling as well as utilization of public transportation.	No mitigation needed
SOCIOECONOMIC			
Employment and Income Patterns	1	Temporary employment will be increased during the redevelopment project with	No mitigation

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
LAND DEVELOPMENT			
		opportunities for local labor positions. There may be opportunities for local sub-contractors during redevelopment. Consideration will be made for a local job placement for property management upon completion.	needed
Demographic Character Changes / Displacement	2	This site is for a mixed-use project with 98 loft apartments and is located in our Downtown area, which currently does not offer enough housing. This redevelopment project will be a catalyst for other downtown redevelopment including more housing opportunities, retail, professional services, and entertainment venues. Future residents will have fluid access to local services by convenient public transportation, private vehicle, and a future walkable community. Access to both college campuses as well as hospitals and retail shopping will be convenient. This project does not create a concentration of low income or disadvantaged people. Another project is planned simultaneously across the street utilizing private funds that consist of all market rate apartments. There will be no business or persons displaced as a result of this project. It is anticipated that this project will draw more development and people to this area of our city.	No mitigation needed
COMMUNITY FACILITIES AND SERVICES			
Educational and Cultural Facilities (Access and Capacity)	2	It is projected that this completed project will house a majority of single persons. The developer plans include 98 residential units with an early estimated 40% efficiency apartments, 50% one-bedroom; and 10% two -bedroom units. It is also expected that residents who choose to rent these units currently live in Texarkana and wish to downsize, move into their first apartment, or laterally relocate into a newer more energy efficient unit. The most likely demographic will be new college graduates, teachers, nurses, police and fire, empty nesters, and	No mitigation needed

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
LAND DEVELOPMENT			
		college students. It is estimated that no more than 10% of the units will be occupied by individuals with children. This development is in the Texarkana Independent School District (TISD), who has progressive plans for growth at all campuses. This project will not have a negative impact on the TISD school system.	
Commercial Facilities (Access and Proximity)	1	This project if mixed use of residential and retail/office space. Area businesses includes banks, hair salon, restaurants, law offices, municipal offices, retail stores, and entertainment venues. Development of this site will bring patrons closer to these amenities; thereby, enhancing business' revenues. Nearby services support all socioeconomic levels. The Texarkana, Texas Farmers Market is within walking distance of this project site, grocery and various retail stores are convenient by automobile or public transportation.	No mitigation needed
Health Care / Social Services (Access and Capacity)	2	Health Care is easily assessible to this site. Wadley Regional Medical Center is conveniently located 7-blocks away. Doctor's office's including specialist are located within walking distance to this site as well as via public transportation. The Texarkana, Bowie County Health Center is approximately 11 blocks away and is easily assessible via public transportation or private vehicle.	No mitigation needed
Solid Waste Disposal and Recycling (Feasibility and Capacity)	2	General construction waste as well as asbestos containing materials, and lead-based paint materials will be removed from this project site. Waste Management, located at 1030 W. US HWY 82, New Boston, Texas, consist of 133 acres with a nearly 200-acre buffer area. This landfill accepts municipal solid waste, construction/demolition debris, industrial waste Class 2 and Class 3, Special waste, treated medical waste, asbestos, and all other waste that is non-hazardous and not a	No mitigation needed

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
LAND DEVELOPMENT			
		<p>Class 1 Industrial Waste. An EPA approved cleanup plan will be followed for the abatement of materials containing asbestos and lead-based paint. All materials will be disposed of according to all applicable laws. An Environmental Professional will be on site during the abatement of process to ensure all laws and safe handling practices are followed. Waste Management has been contacted and confirmed they have the capacity to handle all materials removed from this site. After completion of the project, Waste Management will be the disposal company for garbage collection and recycling. Waste Management has confirmed they have the capacity to service this site and the landfill is more than adequate to handle the waste and recycling.</p>	
Waste Water and Sanitary Sewers (Feasibility and Capacity)	2	<p>Texarkana Water Utilities (TWU) is a municipal utility that handles all waste water and sanitary sewer in the City of Texarkana, Texas. The Executive Director of TWU advised that the daily treatment capacity of the wastewater treatment plant this location flows to is 18 MGD. There is a six inch (6") sanitary sewer main that serves this location. The projected daily wastewater flow from the Grimm Lofts Project would be approximately 24,500 gallons per day. The peak flow rate is projected to be approximately 68 gallons per minute (GPM). The capacity of a six-inch gravity sewer main is 196 GPM. The Utility should have no problems supplying the wastewater needs of the proposed project.</p>	No mitigation needed
Water Supply (Feasibility and Capacity)	2	<p>Texarkana Water Utilities (TWU) is a municipal utility and consist of a large water treatment plant with clean, safe water a priority. The Executive Director of the TWU advised that the daily treated water capacity of the Texarkana Water Utilities is 33 million gallons per day (MGD). The daily average usage in 2016 was 15.6 MGD. There are</p>	No mitigation needed

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
LAND DEVELOPMENT			
		<p>eight-inch (8") and ten-inch (10") water mains around the Grimm Lofts Project site that can easily accommodate the anticipated demand for potable water. The Utility should have no problems supplying the treated water needs of the proposed project.</p>	
<p>Public Safety - Police, Fire and Emergency Medical</p>	<p>2</p>	<p>The City's main police station is located one block from the proposed development. The average response for the Police Department in 2016 was 5 minutes 44 seconds. The project for the Hotel Grim has been reviewed by the Police Department and is not expected to have a significant impact on the Police Department's ability to respond to calls or negatively affect equipment used to respond. A fire station is located 3 blocks from this project with an estimated response time of 2 minutes for the first responding unit. The Texarkana, Texas Fire Department has 78 uniformed personnel who operate out of 5 strategically located fire stations. The fire department also has automatic and mutual aid agreements with Texarkana, Arkansas Fire Department, Wake Village Fire Department, Nash Fire Department, C-5 Volunteer Fire Department, Pleasant Grove Volunteer Fire Department, Cass County ESD #2, Atlanta Fire Department, and Red River Army Depot Fire Department. Given the resources of the department as well as those available through agreement Chief Schlotter is confident that the Fire Department is adequately equipped and trained to service the Grim Hotel project. Chief Schlotter also advises that the project will not create a significant burden on the fire department and the fire department is eager to see the project begin and looks forward to working with all involved to ensure success. LifeNet services the Texarkana area for EMT/ambulance services. LifeNet is able to maintain low response times by utilizing the concept called system status management</p>	<p>No mitigation needed</p>

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
LAND DEVELOPMENT			
		(SSM). SSM is the science of matching demand for service with the supply of ambulances. Using SSM allows LifeNet to maintain and improve operational efficiency and customer satisfaction, while keeping costs under control. Wadley Regional Medical Center is located 7 blocks away.	
Parks, Open Space and Recreation (Access and Capacity)	2	Open space, recreational and cultural facilities are located within reasonable walking distance to the project area, and adequate public transportation is available for the project site to additional facilities. Within walking distance of one block is Discovery Place Children's Museum and the Museum of Regional History is across the street from the project site. Also, a short walk away ³ (0.3 miles) is Kidtopia Park, a 2.06-acre park with a playground, skate park area, and open green space. Once block to the west is the Perot Theatre, which host a variety of cultural events including symphonies, shows, concerts, and local recitals. Two blocks from this development is the Texarkana Regional Arts and Humanities Council which host events, art exhibits, and has an outdoor art park. Three blocks from this site is the Silver Moon, which host local events as well as a children's theatre utilizing local talent. This project is convenient to ball fields in Texarkana via public transportation or private vehicle. The City's draft update to our Comprehensive Plan outlines a short-term goal to extend the current art park with an art and entertainment area and will include an outdoor stage, a covered farmers market, and green space. This area is located two blocks from the project site. The update to the City's Comprehensive also outlines plans to extend bicycle and pedestrian trails in the nearby area connecting to other existing trails.	No mitigation needed
Transportation and Accessibility (Access and	2	The site is easily assessible via all modes of transportation. Texarkana's Public Transit	No mitigation

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
LAND DEVELOPMENT			
Capacity)		System has a convenient bus schedule that will accommodate any needs. The public transit system can accommodate the needs of the new residential units. A new bus stop will be added to this site once the project is complete. There are bicycle racks conveniently located nearby and another will be added on this site upon completion of the project. A parking lot is planned that will accommodate residents.	needed
NATURAL FEATURES			
Unique Natural Features /Water Resources	2	This project is located in our downtown area and is not near any natural features or water resources. This project is rehabilitation of an existing structure and does not impact the groundwater. There are no surface water features near the project site.	No mitigation needed
Vegetation / Wildlife (Introduction, Modification, Removal, Disruption, etc.)	2	This project is located in our downtown area and consists of rehabilitation of an existing structure. The entire parcel is covered by concrete or asphalt and does not consist of vegetation that will be ecologically disrupted. There are no existing plant communities than will be effected. There are no trees on this project site; however, some type of landscaping will be added that may consist mainly of container landscaping. Since the project is in a downtown, central business district and the site does not consist of natural vegetation or trees, and is covered with concrete or asphalt, there is not a wildlife population that will be effected.	No mitigation needed
Other Factors			No mitigation needed

Supporting documentation

[Zoning District Definitions.docx](#)

[Grim Hotel Phase II \(1\).pdf](#)

[New Boston Landfill Expansion.pdf](#)

[Map Zoning Overlay Grimm Lofts Project.pdf](#)

Additional Studies Performed:

Phase I and II ESA utilizing EPA Brownfields Assessment Funds

[Grim Hotel Phase II \(2\).pdf](#)

[Grim Hotel Phase I ESA\(1\).pdf](#)

Field Inspection [Optional]: Date and completed by:

Daphnea Ryan

12/5/2016 12:00:00 AM

[Grim Pic 2.jpg](#)

[Grim Pic 1.jpg](#)

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

City of Texarkana, Texas Planning and Community Development City of Texarkana Police Department City of Texarkana Fire Department Texarkana Water Utilities City of Texarkana, Texas GIS Department City of Texarkana, Texas Parks and Recreation City of Texarkana, Texas Public Works Texarkana Independent School District LifeNet Waste Management USDA Soil Survey at <http://websoilsurvey.nrcs.usda.gov/app/HomePage.htm>

[Soil Map.pdf](#)

List of Permits Obtained:

Storm Water Construction Permit Building Permits

Public Outreach [24 CFR 58.43]:

Combined Notice Finding of No Significant Impact and Request for Release of Funds was posted in the Texarkana Gazette 06/09/2017, at Texarkana Texas City Hall exterior and interior announcement boards, on the City of Texarkana, Texas website at <http://www.ci.texarkana.tx.us/>, and was mailed to Tribes, EPA, SHPO, and TDHCA Housing Tax Credit Division.

[COMBINED NOTICE FONSI RROF Posting Final.pdf](#)

[Mailing of Combined Notice Labels.pdf](#)

[Combined Notice FONSI RROF Interested Parties Mailing.xlsx](#)

Cumulative Impact Analysis [24 CFR 58.32]:

Positive impact is expected on the environment. Rehabilitation of a long-term vacant distressed structure provides a healthier, cleaner environment. This project is a giant step forward to revitalizing Texarkana's downtown. Since this is located in a completely built environment, there are no significant impacts expected with regard to wildlife, natural features, soil erosion, landscaping, etc.

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

Issues are not anticipated that would require an alternative course of action.

No Action Alternative [24 CFR 58.40(e)]

Future conditions expected is a completely rehabilitated vacant structure into loft apartments with retail space on the ground floor with dressed windows, curb appeal, and a safe, welcoming atmosphere. This rehabilitation project will create a healthier environment by removing asbestos and lead-based paint from this distressed structure and creating a healthy, vibrant space. Completed project will increase the tax revenue for the City for this site as well as fuel other redevelopments.

Summary of Findings and Conclusions:

Overall, the proposed redevelopment of the Grim Hotel will result in a much needed improvement to what currently exists. The other alternative will be to continue the existence of a blighted property and hinder other redevelopment. Beneficial impacts of the proposed project include removing blighted conditions and replacing with a new mixed-use development; providing affordable housing options, providing housing options in downtown; increase retail sales, and spark further redevelopment of our downtown area.

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	This site is utilizing EPA Revolving Loan Funds for the abatement of asbestos and lead-based paint found present in the structure, as well as encapsulation of the open portion of the parcel for minor soil contamination. A cleanup plan and Analysis of Brownfields Cleanup Alternative will be submitted to EPA for approval and undergo a 30-day comment period. All abatement will be conducted in compliance with federal and state regulations.	N/A	
Conformance with Plans / Compatible Land Use and Zoning / Scale and Urban Design	No mitigation needed	N/A	
Soil Suitability / Slope/ Erosion /	No mitigation needed	N/A	

Drainage and Storm Water Runoff			
Hazards and Nuisances including Site Safety and Site-Generated Noise	No mitigation needed	N/A	
Energy Consumption/Energy Efficiency	No mitigation needed	N/A	
Employment and Income Patterns	No mitigation needed	N/A	
Demographic Character Changes / Displacement	No mitigation needed	N/A	
Educational and Cultural Facilities (Access and Capacity)	No mitigation needed	N/A	
Commercial Facilities (Access and Proximity)	No mitigation needed	N/A	
Health Care / Social Services (Access and Capacity)	No mitigation needed	N/A	
Solid Waste Disposal and Recycling (Feasibility and Capacity)	No mitigation needed	N/A	
Waste Water and Sanitary Sewers (Feasibility and Capacity)	No mitigation needed	N/A	
Water Supply (Feasibility and Capacity)	No mitigation needed	N/A	
Public Safety - Police, Fire and Emergency Medical	No mitigation needed	N/A	
Parks, Open Space and Recreation (Access and Capacity)	No mitigation needed	N/A	
Transportation and Accessibility (Access and Capacity)	No mitigation needed	N/A	
Unique Natural	No mitigation needed	N/A	

Features /Water Resources			
Vegetation / Wildlife (Introduction, Modification, Removal, Disruption, etc.)	No mitigation needed	N/A	
Other Factors	No mitigation needed	N/A	
Permits, reviews and approvals	Storm Water Construction Permit Building Permits	N/A	

Mitigation Plan

Abatement of asbestos and lead-based paint will be carried out in accordance with NESHAP and EPA guidelines. An EPA Brownfields approved cleanup plan will be followed. There will be a 30-day public comment period for the Cleanup Plan prior to EPA approval. Through our EPA Brownfields RLF Grant, the City has hired an Environmental Consultant, Stanley Associates to provide Qualified Environmental Professional (QEP) services during this project. The QEP will be on-site to ensure all abatement is completed and all law and regulations are followed. Permits are issued through our Building and Inspections Department and is over seen by Michele Daniels. This department and the Chief Building Official, Keith Lee, will ensure all construction activities follow Code.

[ACM - Hotel Grim Specifications - Swiftcreek \(002\).pdf](#)

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 nearest airport is 2.78 miles from this site. The project is in compliance with Airport Hazards requirements.

Supporting documentation

[Airport Clearance.JPG](#)

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

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

[CoastalBoundaryMap.pdf](#)

[Coastal Barrier Resources System.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:

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

[FEMA Firm Map.pdf](#)

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

The project's county or air quality management district is in attainment status for all criteria pollutants. The project is in compliance with the Clean Air Act.

Supporting documentation

[Non Attainment Areas Map.JPG](#)

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. This site is located 220+ miles from the nearest Coastal Zone Management area, which is in Orange County, Texas. The project is in compliance with the Coastal Zone Management Act.

Supporting documentation

[Coastal Zone Management Distance.jpg](#)
[Coastal Barrier Resources System\(1\).pdf](#)
[CoastalBoundaryMap\(1\).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

- Yes

3. Mitigation

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

Can adverse environmental impacts be mitigated?

Adverse environmental impacts cannot feasibly be mitigated.

- ✓ Yes, adverse environmental impacts can be eliminated through mitigation. Document and upload all mitigation requirements below.

4. Describe how compliance was achieved in the text box below. 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.

This site is utilizing EPA Revolving Loan Funds for the abatement of asbestos and lead-based paint found present in the structure, as well as encapsulation of the open portion of the parcel for minor soil contamination. A cleanup plan and Analysis of Brownfields Cleanup Alternative will be submitted to EPA for approval and undergo a 30-day comment period. All abatement will be conducted in compliance with federal and state regulations.

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

- ✓ Complete removal
- ✓ Risk-based corrective action (RBCA)

Screen Summary

Compliance Determination

Site contamination was evaluated as follows: ASTM Phase I ESA, ASTM Phase II ESA. Findings of the Phase II are as follows: Mercury, arsenic, and lead concentrations exceeded the TCEQ Action Levels of 0.04, 5.9, and 15 mg/kg, respectively, in the near surface soil samples of B-2 (1-2 feet below ground surface, or bgs) and B-4 (1-2 feet bgs). Mercury was detected at concentrations of 0.115 mg/kg and 0.412 mg/kg, respectively; Arsenic exceeded action levels in B-4 (1-2 feet bgs) only at a concentration of 8.88 mg/kg; and lead exceeded action levels at concentrations of 373 and 1,400 mg/kg, respectively. Other metal constituents were not detected at concentrations exceeding the respective TCEQ Action Levels. TPH, VOCs, SVOCs, herbicides and pesticides were not detected above their respective action levels and/or the laboratory detection limit in the soil samples. Groundwater Lead was detected in concentrations above the TCEQ Action Level of 0.015 mg/l in the four groundwater samples collected for laboratory analysis. Concentrations were detected in MW-1 through MW-4 at 0.0928, 0.0638, 0.0583, and 0.0656 mg/l, respectively. TPH, VOCs, SVOCs, herbicides and pesticides were not detected above their respective action levels and/or the laboratory detection level in the groundwater samples. Groundwater was encountered at approximately 17 to 23 bgs. The groundwater flow direction across the site appears to flow inward with a slight northeast flow component. Asbestos Containing Material was found in Aircell thermal system insulation (TSI) insulated piping on each floor; 12" x 12" vinyl asbestos floor tile (VAT) on the first floor; 9" x 9" vinyl asbestos floor tile (VAT) on the

second floor through the eighth floor; Roof mastic on the roof; Black pipe insulation above basement hallway between HVAC shop and pump maintenance shop. Lead-based paint was found in Pink paint in lobby entrance; brown paint in lobby entrance and trim throughout hotel; green paint in south store rooms on first floor; blue in north portion of lobby; and white paint on plaster walls throughout hotel. The adverse environmental impacts can be mitigated. With mitigation, identified in the mitigation section of this review, the project will be in compliance with contamination and toxic substances requirements.

Supporting documentation

[Updated FINAL Phase I ESA Grim Hotel 022117.pdf](#)

[Grim Hotel Phase II .pdf](#)

[Grim Hotel Phase I ESA.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

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

2. Are federally listed species or designated critical habitats present in the action area?

No, the project will have No Effect due to the absence of federally listed species and designated critical habitat

- ✓ Yes, there are federally listed species or designated critical habitats present in the action area.

3. What effects, if any, will your project have on federally listed species or designated critical habitat?

- ✓ No Effect: Based on the specifics of both the project and any federally listed species in the action area, you have determined that the project will have absolutely no effect on listed species or critical habitat. in the action area.

Document and upload all documents used to make your determination below. Documentation should include a species list and explanation of your conclusion, and may require maps, photographs, and surveys as appropriate

May Affect, Not Likely to Adversely Affect: Any effects that the project may have on federally listed species or critical habitats would be beneficial, discountable, or insignificant.

Likely to Adversely Affect: The project may have negative effects on one or more listed species or critical habitat.

6. For the project to be brought into compliance with this section, all adverse impacts must be mitigated. Explain in detail the exact measures that must be implemented to mitigate for the impact or effect, including the timeline for implementation. This information will be automatically included in the Mitigation summary for the environmental review. If negative effects cannot be mitigated, cancel the project using the button at the bottom of this screen.

Mitigation as follows will be implemented:

✓ No mitigation is necessary.

Explain why mitigation will not be made here:

There are three birds listed, the Least Tern, Red Knot, and Piping Plover. The Red Knot and Piping Plover are only affected by Wind Energy Projects and this project does not include Wind Energy. The Least Tern habitat is sandy, sparsely vegetated beaches, salt flats, etc. along waterways and this project is not located in or near the Least Tern habitat area.

Screen

Summary

Compliance Determination

This project has been determined to have No Effect on listed species. There are three birds listed, the Least Tern, Red Knot, and Piping Plover. The Red Knot and Piping Plover are only affected by Wind Energy Projects and this project does not include Wind Energy. The Least Tern habitat is sandy, sparsely vegetated beaches, salt flats, etc. along waterways and this project is not located in or near the Least Tern habitat area. This project is in compliance with the Endangered Species Act without mitigation.

Supporting documentation

[Endangered Species Habitat of a Least Tern.pdf](#)
[Endangered Species.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

Yes

4. Is the Separation Distance from the project acceptable based on standards in the Regulation?

Yes

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

No

Screen Summary

Compliance Determination

There is a current or planned stationary aboveground storage container of concern within 1 mile of the project site. A study was performed by ERI Consulting, which concluded that the Separation Distance from the project is acceptable. The project is in compliance with explosive and flammable hazard requirements.

Supporting documentation

[17192 CITY OF TEXARKANA ACCEPTABLE SEPARATION DISTANCE STUDY.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:

This project is in Texarkana's Central Business District, which does not contain any open land.

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. Land use for this area is Central Business and does not contain any open land. The project is in compliance with the Farmland Protection Policy Act.

Supporting documentation

[Land Use 301 N State Line Ave.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:

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

[FEMA Firm Map\(1\).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" 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
- ✓ Advisory Council on Historic Preservation Not Required
- ✓ Indian Tribes, including Tribal Historic Preservation Officers (THPOs) or Native Hawaiian Organizations (NHOs)

- ✓ Alabama-Coushatta Tribe of Texas Completed
- ✓ Apache Tribe of Oklahoma Response Period Elapsed
- ✓ Caddo nation of Oklahoma Response Period Elapsed
- ✓ Choctaw Nation of Oklahoma Response Period Elapsed
- ✓ Coushatta Tribe of Louisiana Response Period Elapsed
- ✓ Muscogee (Creek) Nation Completed
- ✓ Osage Nation Completed
- ✓ Tonkawa Tribe of Indians of Oklahoma Response Period Elapsed
- ✓ Wichita and Affiliated Tribes of Oklahoma Response Period Elapsed

Other Consulting Parties

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

State Historic Preservation Officer consulted as required by regulations. Ground disturbance will occur on this site during redevelopment; therefore, Tribes were consulted.

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:**

Within sight of the Grim Hotel

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
317-323 N. State Line Avenue	Listed	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 A survey of property near the Grim Hotel was conducted for the City of Texarkana, Texas by Beverly J. Rowe, PhD in American History as part of the application for Historical designation of the Grim Hotel. We are also attaching a city wide historical survey that was originally conducted in 1981 with assistance from the Texas Historical Commission by Daniel Hardy and David Moore, Preservation Consultants, and updated in 2011 by Dr. Beverly J. Rowe.

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:

Consulted parties concur that no historic properties will be affected by this project.

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. Conditions: Project plans and specifications are reviewed and approved through the Texas Historical Commission Historic Tax Credit Program. Unless the Historic Tax Credit Program staff does not get the opportunity to review the proposed rehabilitation, or the proposal changes, the project may proceed without further Section 106 consultation.. The project is in compliance with Section 106.

Supporting documentation[THC - No Adverse Effect 106 HUD GrimHotel Texarkana.pdf](#)[Historic Resource Survey - Revised & Expanded Part III.pdf](#)[Historic Resource Survey - Revised & Expanded Part II.pdf](#)[Historic Resource Survey - Revised & Expanded Part I.pdf](#)[Historic Resource Survey 1981.pdf](#)[Rialto Building Combined.pdf](#)[Muscogee Creek Nation Finding Grim 301 N State Line.pdf](#)[Alabama Coushatta Tribe of Texas Finding Grim 301 N State Line.pdf](#)[Osage Nation Finding Grim 301 N State Line.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

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: 62.7

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: 62.7

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

Screen Summary

Compliance Determination

The project is modernization/rehabilitation of an existing vacant former Hotel and extended stay efficiency rooms. A Noise Assessment was conducted for this site. The inputs described in this report for the assessment site at 301 N. Stateline Ave. were modeled using the HUD DNL Calculator. The combined DNL for all road and rail sources was 62.7 dB. This falls below the HUD threshold of 65 dB. The assessment site has an acceptable day/night noise environment. See attached.. The project is in compliance with HUD's Noise regulation without mitigation.

Supporting documentation

[ES#17-290 CITY OF TEXARKANA NOISE EXPOSURE ASSESSMENT 301 NORTH STATELINE AVENUE.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. 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 nearest Sole Source Aquifer Area is 143.6 miles. The project is in compliance with Sole Source Aquifer requirements.

Supporting documentation

[Sole Source Aquifers Distance.JPG](#)

[Sole Source Aquifers Distance 143.6.JPG](#)

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 project will not impact on- or off-site wetlands. This site is located in our downtown district

that is fully developed and is not near a wetland. The project is in compliance with Executive Order 11990.

Supporting documentation

[Wetlands Map.JPG](#)

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 nearest NWSRS is 60.3 miles away. The project is in compliance with the Wild and Scenic Rivers Act.

Supporting documentation

[Wild Scenic River Map.JPG](#)

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

2. Were these adverse environmental impacts disproportionately high for low-income and/or minority communities?

Yes

No

Explain:

The adverse environmental impacts found are abatement of asbestos, lead-based paint, and guano, which are commonly found in older structures. The developer is utilizing EPA Brownfields funds to mitigate these issues.

Based on the response, the review is in compliance with this section. Document and upload any supporting documentation below.

Screen Summary

Compliance Determination

Adverse environmental impacts are not disproportionately high for low-income and/or minority communities. In addition, the environmental impacts found will be abated by the developer utilizing EPA Brownfields Funds; thereby eliminating the adverse environmental impacts. The project is in compliance with Executive Order 12898.

Supporting documentation

Are formal compliance steps or mitigation required?

Yes

No