

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

Project Information

Project Name: Educare-West-DuPage-Facility-Enhanced-Safety-Upgrades

HEROS Number: 900000010466028

Start Date: 04/22/2025

Responsible Entity (RE): CHICAGO, 121 N Lasalle St Chicago IL, 60602

State / Local Identifier:

RE Preparer: City of West Chicago

Certifying Officer Michael Guttman
r:

Grant Recipient (if different than Responsible Entity): Educare West DuPage

Point of Contact: Marcela Sweeney

Point of Contact: Lisa Mash

Consultant (if applicable): Civil & Environmental Consultants, Inc.

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

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

Project Location: 851 Pearl Rd, West Chicago, IL 60185

Additional Location Information:

The approximate 3.6-acre site (Parcel ID: 04-16-201-013) is currently owned by Educare of West DuPage and is bounded by Pioneer Park to the north (see Figures 1 & 2).

Direct Comments to:

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

Educare West DuPage (EWD) will utilize Community Project Funding (CPF) funds for installation of safety and efficiency upgrades to their existing school facility. The school was built in 2012 and is approximately 17,130 square feet (sq ft) in size. Latest renovations to the interior of the facility including flooring, painting, and a new intercom system occurred in 2022. The purpose of the proposed projects is to provide enhanced safety measures that meet Illinois Department of Children and Family Services (DCFS) regulations and requirements and to improve the efficiency of the building which allows for lower overhead costs. The areas of focus will enable EWD to provide a safe space for children and families that they serve, and to utilize more of its major funding awards to directly benefit the students, families, and employees of EWD. The proposed facility upgrades include:

- * Updated Lighting: All existing lighting throughout the interior and exterior spaces of the school building will be upgraded to include high-efficiency light-emitting diodes (LEDs) to increase security and enhance safety around the school.
- * Brick Paver Replacement: The worn brick pavers on both sets of playgrounds and along the main entrance to the building will be replaced due to safety concerns associated with the current condition of existing pavers. The landscaping contractor will remove the old pavers, level the surface, and lay the new pavers. This will provide safer entry and exit by creating an even walkway to the entrance of the building, and a safer space on each playground for children's activities by repairing the existing patios.
- * Other Safety Enhancements:
 - o Replace the existing camera system at the front of the school and in the front and back parking lots as the current system is no longer operable and the area surrounding the school has had increased safety concerns in recent years.
 - o Create a new single swing gate on each playground, each equipped with an electric strike plate controlled by the school's door fob to replace the existing set of double gates currently secured by a padlock which creates a hazard for students and staff to evacuate the areas of the playgrounds in a timely manner in the event of an emergency.

EWD serves a total of 182 children between the ages of birth through 5 years old, and their families, 48 children from birth to 3, 102 children from 3-5, and 10 pregnant parents. These proposed improvements would allow EWD to continue to provide an enhanced space for students and families to receive a quality learning experience in a safer and more secure environment.

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

[350122_EC01_Site_Maps_Fig2.pdf](#)

[350122_EC01_Site_Maps_Fig1.pdf](#)

[Part-58-CEST-Educare West DuPage_Photos.pdf](#)

Level of Environmental Review Determination:

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

58.35(a)(3)(iii)

Determination:

	This categorically excluded activity/project converts to EXEMPT per Section 58.34(a)(12), because it does not require any mitigation for compliance with any listed statutes or authorities, nor requires any formal permit or license; Funds may be committed and drawn down after certification of this part for this (now) EXEMPT project; OR
✓	This categorically excluded activity/project cannot convert to Exempt status because one or more statutes or authorities listed at Section 58.5 requires formal consultation or mitigation. Complete consultation/mitigation protocol requirements, publish NOI/RROF and obtain “Authority to Use Grant Funds” (HUD 7015.16) per Section 58.70 and 58.71 before committing or drawing down any funds; OR
	This project is not categorically excluded OR, if originally categorically excluded, is now subject to a full Environmental Assessment according to Part 58 Subpart E due to extraordinary circumstances (Section 58.35(c)).

Approval Documents:

7015.15 certified by Certifying Officer

on:

7015.16 certified by Authorizing Officer

on:

Funding Information

Grant / Project Identification Number	HUD Program	Program Name	Funding Amount
B-24-CP-IL-0836	Community Planning and Development (CPD)	Community Project Funding (CPF) Grants	\$161,250.00

Estimated Total HUD Funded, Assisted or Insured Amount: \$161,250.00

Estimated Total Project Cost: \$161,250.00

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 nor is it within an Airport Runway Clear/Protection Zone. The DuPage Airport is the nearest civilian airport located approximately 2.5 miles northwest of the project site (see Figure 3). Therefore, no further assessment for compliance with 24 CFR Part 51 Subpart D pertaining to Airport Hazards or Airport Runway Clear/Protection Zones is required.
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	The proposed project is located in a state that does not contain Coastal Barrier Resources System (CBRS) units. The closest CBRS is Sadony Bayou located approximately 138 miles from the project site in Michigan (see Figure 4). Therefore, no further assessment for compliance with the Coastal Barrier Resources Act is required.
Flood Insurance Flood Disaster Protection Act of	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Civil & Environmental Consultants, Inc. (CEC) performed a review of the Flood

<p>1973 and National Flood Insurance Reform Act of 1994 [42 USC 4001-4128 and 42 USC 5154a]</p>		<p>Insurance Rate Map (FIRM), published by the Federal Emergency Management Agency (FEMA). According to Panel Number 17043C-0127J, effective August 1, 2019, the project site is located entirely outside the 100-year floodplain and within an area of minimal flood hazard, Zone X (see NFHL FIRMette). The nearest documented floodplain by FEMA is approximately 1.64 miles northeast of the project site (see Figure 5). The proposed project does not involve new construction or land conversion activities but rather safety upgrades and enhancements to the interior and exterior of the existing school facility. Thus, there would be no impacts to floodplains as they are absent from the site and the proposed project is not located within or adjacent to a Special Flood Hazard Area (SFHA). Therefore, no further assessment for compliance with the Flood Disaster Protection Act is required.</p>
<p>STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR §50.4 & § 58.5</p>		
<p>Air Quality Clean Air Act, as amended, particularly section 176(c) & (d); 40 CFR Parts 6, 51, 93</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>The proposed project does not include new construction or conversion of land use. Project plans include updated lighting throughout the interior and exterior spaces of the building, replacing worn brick pavers around the building, and other safety enhancements such as replacing the existing camera system at the front of the school and in the front and back parking lots. The proposed project will not have an impact to the local air quality as no excavation activities are proposed, and no vehicle exhaust emissions are anticipated. There will be no short-term, long-term, minor, or local operational emissions associated with the proposed project. Therefore, no further assessment for</p>

		compliance with the Clean Air Act is required.
Coastal Zone Management Act Coastal Zone Management Act, sections 307(c) & (d)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	The proposed project site is not located within or does not affect a Coastal Zone Boundary as defined by the Illinois Coastal Management Program. The project site is located approximately 27 miles from the nearest Coastal Zone Boundary (see Figure 6). Therefore, no further assessment for compliance with the Coastal Zone Management Act is required.
Contamination and Toxic Substances 24 CFR 50.3(i) & 58.5(i)(2)]	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	On-site toxic, hazardous, or radioactive substances that could affect the health and safety of the children and school staff or conflict with the intended use of the Subject Property located at 851 Peral Road were not found. Civil and Environmental Consultants, Inc. (CEC) conducted a visual assessment of the Subject Property on January 28, 2025, and all chemicals observed on-site were properly stored and kept locked to prevent access by the facility's children. No staining, stressed vegetation, unmarked chemical containers, or spills were noted. An EDR database search report and historical resources were consulted for the Subject Property which is included as an attachment. The database report had no listings for the Subject Property. However, the east-adjointing site beyond the elevated railroad tracks, was listed under the names Kerr-McGee Chemical, Rare Earths Facility and Tronox LLC on several databases including the NPL/ SEMS ROD PRP, and SEMS-Archive (all Superfund related), US Engineering Controls, ICIS, IL Solid Waste Landfill, Impoundment, underground storage tanks (UST), and the Resource Conservation and Recovery Act (RCRA) Non-Generator/No Longer Reporting databases. These

		<p>listings all relate to the former Kerr-McGee Company, which operated a mill on this property dating back to 1931, that extracted thorium and nonradioactive elements from ores. Later this property was used to manufacture gaslight mantles, which contain thorium, mesothorium and hydrofluoric acid. The operation was closed in 1973. Elevated radiation levels were subsequently identified on the property, and at 87 additional sites in the area related to contaminated material from the site that had been used as fill material elsewhere. Records of Decision were issued for the site in 2003 to address the site's cleanup. The final radiation cleanup of the groundwater at the Kerr-McGee site is slated to finish in 2026. After the groundwater remediation portion of the decommissioning activities has been completed, the lands associated with those activities at that site will be conveyed to the City of West Chicago for park development. No other sites posing environmental concern for the Subject Property were identified based on review of the database records and historical information by CEC. No radon testing data was available from the facility and no radon mitigation systems are currently in place. Radon testing results for the area of DuPage County where the facility is located (60185) were obtained from the Illinois Department of Public Health (IDPH). Illinois' regulations require radon testing of commercial buildings to be performed by licensed individuals. The cost of radon testing for commercial buildings and daycare centers in the area of the facility is in the range of \$1,500. It was determined that the cost of radon testing would be too great an</p>
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		impact to the small budget for the proposed grant funded projects when compared to the potential to find an exceedance of the guidance level of 4.0 pCi/L. Also, given that the proposed improvements will not require excavation or disturbance of site soils, an increase in existing radon levels is not anticipated. Also, the majority of the proposed projects will be done on the exterior of the building. Therefore, no further assessment for compliance with HUD's radon contamination regulations is required.
Endangered Species Act Endangered Species Act of 1973, particularly section 7; 50 CFR Part 402	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	This project will have No Effect on federal or state listed species due to the nature of the activities involved in the project. Project plans include updated lighting throughout the interior and exterior spaces of the existing school building, replacing worn brick pavers around the building, and other safety enhancements such as replacing the existing camera system at the front of the school and in the front and back parking lots. These activities are not expected to impact listed species or their habitat. Therefore, no further assessment for compliance with the Endangered Species Act is required.
Explosive and Flammable Hazards Above-Ground Tanks)[24 CFR Part 51 Subpart C	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	The proposed project does not involve a hazardous facility that will store, handle or process flammable or combustible chemicals. No existing explosive or flammable hazards or aboveground stationary storage tanks (ASTs) were observed at the project site during the visual inspection performed by CEC on January 28, 2025. Based upon review of the database search report from EDR (provided as an attachment to the Contamination and Toxic Substances Partner Worksheet), there are no active underground storage tank sites

		registered with the Illinois Office of the State Fire Marshal (OSFM) located within 0.5 mile of the project site. Therefore, no further assessment for compliance with 24 CFR Part 51 Subpart C pertaining to Explosive and Flammable Hazards is required.
Farmlands Protection Farmland Protection Policy Act of 1981, particularly sections 1504(b) and 1541; 7 CFR Part 658	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	The project site is located within an urban area as designated by the US Census. The scope of work does not include new construction, acquisition of undeveloped land or farmland conversion. Project plans include updated lighting throughout the interior and exterior spaces of the existing school building, replacing worn brick pavers around the building, and other safety enhancements such as replacing the existing camera system at the front of the school and in the front and back parking lots. The project is in compliance with the Farmland Protection Policy Act and no further assessment is required.
Floodplain Management Executive Order 11988, particularly section 2(a); 24 CFR Part 55	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	According to the Federal Flood Standard Support Tool, the proposed project is not located in the coastal or riverine Federal Flood Risk Management Standard (FFRMS) floodplain (see FFRMS Freeboard Value Approach Report), and the project site is located entirely outside the 100-year floodplain and within an area of minimal flood hazard, Zone X (see NFHL FIRMette). The proposed project does not include new construction or conversion of land use. Project plans include updated lighting throughout the interior and exterior spaces of the building, replacing worn brick pavers around the building, and other safety enhancements such as replacing the existing camera system at the front of the school and in the front and back parking lots. No further

		assessment for compliance with 24 CFR 55.12 pertaining to floodplain management is required.
Historic Preservation National Historic Preservation Act of 1966, particularly sections 106 and 110; 36 CFR Part 800	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	On February 7, 2025, CEC submitted a consultation letter to the Illinois Historic Preservation Office (IHPO) outlining the results of the literature review (provided under Supporting Documentation). Given the nature of the work, the results of the literature review, and the modern building age, CEC recommended no properties will be affected. On March 3, 2025, the IHPO provided a response to CEC concurring that no historic properties will be affected (provided under Supporting Documentation). Therefore, the proposed project is in compliance with the National Historic Preservation Act (NHPA).
Noise Abatement and Control Noise Control Act of 1972, as amended by the Quiet Communities Act of 1978; 24 CFR Part 51 Subpart B	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Proposed project activities do not involve new construction for residential use or rehabilitation of an existing residential property. Project plans include updated lighting throughout the interior and exterior spaces of the building, replacing worn brick pavers around the building, and other safety enhancements such as replacing the existing camera system at the front of the school and in the front and back parking lots. Additionally, the property is located within an urban area as designated by the US Census (see Figure 7). As the project scope is exterior and interior upgrades to the existing school facility, noise will not be a factor. The project is in compliance with HUD's Noise regulations 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	Based on the project description, this project includes no activities that would require further evaluation under this section. The proposed project is not located on or near a sole source aquifer

		(SSA). The nearest SSA is the Allen County Area Combined Aquifer System located approximately 205 miles south of the project site (see Figure 8). No impacts on a SSA would result from the proposed project; thus, no further assessment for compliance with the Safe Drinking Water Act is required.
Wetlands Protection Executive Order 11990, particularly sections 2 and 5	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Proposed project activities do not involve new construction, expansion of a building's footprint, or ground disturbance. Project plans include updated lighting throughout the interior and exterior spaces of the building, replacing worn brick pavers around the building, and other safety enhancements such as replacing the existing camera system at the front of the school and in the front and back parking lots. A desktop analysis was conducted to help identify potential waters of the U.S. (WOTUS) within the parcel boundary. A review of the USGS topographic map and National Hydrography Dataset (NHD) stream layer identified no streams within the parcel boundary (see Figure 5). A review of the USFWS National Wetlands Inventory (NWI) data identified no potential wetlands within the parcel boundary (see Figure 5). No FEMA 100-year floodplains occur within the parcel boundary. The project is in compliance with Executive Order 11990 and no further assessment is required.
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	The proposed project is not located in proximity to a National Wild and Scenic River System River. The nearest designated wild and scenic river is the Middle Fork Vermillion River approximately 105 miles south of the project site (see Figure 9). No impacts on wild and scenic rivers would result from the proposed project; thus, no

		further assessment for compliance with the Wild and Scenic River Act is required.
HUD HOUSING ENVIRONMENTAL STANDARDS		
ENVIRONMENTAL JUSTICE		
Environmental Justice Executive Order 12898	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	The proposed interior and exterior upgrades to the existing school facility is not anticipated to have a negative impact on the health and welfare of the surrounding communities. As indicated by the other sections of this total Environmental Review, the proposed project would have no significant adverse environmental impacts. No significant disproportionate adverse environmental impacts on minority and low-income residents in the surrounding neighborhoods and local area are anticipated from the proposed safety enhancements to the existing school. The project is in compliance with Executive Order 12898 and no mitigation is necessary.

Mitigation Measures and Conditions [40 CFR 1505.2(c)]:

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

Law, Authority, or Factor	Mitigation Measure or Condition	Comments on Completed Measures	Mitigation Plan	Complete
Contamination and Toxic Substances	Illinois' regulations require radon testing of commercial buildings to be performed by licensed individuals. The cost of radon testing for commercial buildings and daycare centers in	N/A	Not required	

	<p>the area of the facility is in the range of \$1,500. It was determined that the cost of radon testing would be too great an impact to the small budget for the proposed grant funded projects when compared to the potential to find an exceedance of the guidance level of 4.0 pCi/L. Also, given that the proposed improvements will not require excavation or disturbance of site soils, an increase in existing radon levels is not anticipated. Also, the majority of the proposed projects will be done on the exterior of the building. Therefore, no further assessment for compliance with HUD's radon contamination regulations is required.</p>			
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Project Mitigation Plan

Not applicable

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 nor is it within an Airport Runway Clear/Protection Zone. The DuPage Airport is the nearest civilian airport located approximately 2.5 miles northwest of the project site (see Figure 3). Therefore, no further assessment for compliance with 24 CFR Part 51 Subpart D pertaining to Airport Hazards or Airport Runway Clear/Protection Zones is required.

Supporting documentation

[350122_EC02_NEPA_Fig3_Airport_Hazards.pdf](#)

Are formal compliance steps or mitigation required?

Yes

✓ No

Coastal Barrier Resources

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

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

Screen Summary

Compliance Determination

The proposed project is located in a state that does not contain Coastal Barrier Resources System (CBRS) units. The closest CBRS is Sadony Bayou located approximately 138 miles from the project site in Michigan (see Figure 4). Therefore, no further assessment for compliance with the Coastal Barrier Resources Act is required.

Supporting documentation

[350122_EC02_NEPA_Fig4_Coastal_Barrier_Resources.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:

[350122_EC02_NEPA_Firmette.pdf](#)

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

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

✓ No

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

Yes

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

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

Yes

✓ No

Screen Summary

Compliance Determination

Civil & Environmental Consultants, Inc. (CEC) performed a review of the Flood Insurance Rate Map (FIRM), published by the Federal Emergency Management Agency (FEMA). According to Panel Number 17043C-0127J, effective August 1, 2019, the project site is located entirely outside the 100-year floodplain and within an area of minimal flood hazard, Zone X (see NFHL FIRMette). The nearest documented floodplain by FEMA is approximately 1.64 miles northeast of the project site (see Figure 5). The proposed project does not involve new construction or land conversion activities but rather safety upgrades and enhancements to the interior and exterior of the existing school facility. Thus, there would be no impacts to floodplains as they are absent from the site and the proposed project is not located within or adjacent to a Special Flood Hazard Area (SFHA). Therefore, no further assessment for compliance with the Flood Disaster Protection Act is required.

Supporting documentation

[350122_EC02_NEPA_Fig5_ENV_REVIEW.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

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

Screen Summary

Compliance Determination

The proposed project does not include new construction or conversion of land use. Project plans include updated lighting throughout the interior and exterior spaces of the building, replacing worn brick pavers around the building, and other safety enhancements such as replacing the existing camera system at the front of the school and in the front and back parking lots. The proposed project will not have an impact to the local air quality as no excavation activities are proposed, and no vehicle exhaust emissions are anticipated. There will be no short-term, long-term, minor, or local operational emissions associated with the proposed project. Therefore, no further assessment for compliance with the Clean Air Act is required.

Supporting documentation

Are formal compliance steps or mitigation required?

Yes

Educare-West-DuPage-
Facility-Enhanced-Safety-
Upgrades

West Chicago, IL

900000010466028

✓ 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

The proposed project site is not located within or does not affect a Coastal Zone Boundary as defined by the Illinois Coastal Management Program. The project site is located approximately 27 miles from the nearest Coastal Zone Boundary (see Figure 6). Therefore, no further assessment for compliance with the Coastal Zone Management Act is required.

Supporting documentation

[350122_EC02_NEPA_Fig6_Coastal_Zone_Management_Worksheet.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)
Reference		
https://www.onecpd.info/environmental-review/site-contamination		

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

ASTM Phase I ESA

ASTM Phase II ESA

Remediation or clean-up plan

ASTM Vapor Encroachment Screening.

☒ None of the above

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

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

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

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

✓ No

Explain:

On-site toxic, hazardous, or radioactive substances that could affect the health and safety of the children and school staff or conflict with the intended use of the Subject Property located at 851 Peral Road were not found. Civil and Environmental Consultants, Inc. (CEC) conducted a visual assessment of the Subject Property on January 28, 2025, and all chemicals observed on-site were properly stored and kept locked to prevent access by the facility's children. No staining, stressed vegetation, unmarked chemical containers, or spills were noted. Additionally, an EDR database search report and historical resources were consulted for the Subject Property which is included as an attachment. The database report had no listings for the Subject Property.

Yes

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

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

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

Yes

Explain:

✓ No

* Notes:

- Buildings with no enclosed areas having ground contact.
- Buildings containing crawlspaces, utility tunnels, or parking garages would not be exempt, however buildings built on piers would be exempt, provided that there is open air between the lowest floor of the building and the ground.
- Buildings that are not residential and will not be occupied for more than 4 hours per day.

- Buildings with existing radon mitigation systems - document radon levels are below 4 pCi/L with test results dated within two years of submitting the application for HUD assistance and document the system includes an ongoing maintenance plan that includes periodic testing to ensure the system continues to meet the current EPA recommended levels. If the project does not require an application, document test results dated within two years of the date the environmental review is certified. Refer to program office guidance to ensure compliance with program requirements.
- Buildings tested within five years of the submission of application for HUD assistance: test results document indoor radon levels are below current the EPA's recommended action levels of 4.0 pCi/L. For buildings with test data older than five years, any new environmental review must include a consideration of radon using one of the methods in Section A below.

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

Yes

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

✓ No

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

✓ Yes

No

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

Explain:

File Upload:

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

Non-radon contamination was found in a previous question.

6. How was radon data collected?

All buildings involved were tested for radon

- ✓ A review of science-based data was conducted

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

4.3

Provide the documentation* used to derive this value:

No radon testing data was available from the facility and no radon mitigation systems are currently in place. Based on information obtained from the Illinois Department of Public Health (IDPH), radon testing results for the area of DuPage County where the facility is located (60185), have averaged 4.3 pCi/L (data through 2019). Only 25% of the readings listed were greater than 4.0 pCi/L. A screenshot of IDPH's online dashboard is included as an attachment.

File Upload:

[R-350-122_Attachments_Radon Dashboard.pdf](#)

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

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

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

documentation. Ensure that the best available data is utilized, if conducting a scientific data review.

8. Mitigation

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

For instances where radon mitigation is required (i.e. where test results demonstrated radon levels at 4.0 pCi/L and above), then you must include a radon mitigation plan*.

Can all adverse environmental impacts be mitigated?

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

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

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

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

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

Illinois' regulations require radon testing of commercial buildings to be performed by licensed individuals. The cost of radon testing for commercial buildings and daycare centers in the area of the facility is in the range of \$1,500. It was determined that the cost of radon testing would be too great an impact to the small budget for the proposed grant funded projects when compared to the potential to find an exceedance of the guidance level of 4.0 pCi/L. Also, given that the proposed improvements will not require excavation or disturbance of site soils, an increase in existing radon levels is not anticipated. Also, the majority

of the proposed projects will be done on the exterior of the building. Therefore, no further assessment for compliance with HUD's radon contamination regulations is required.

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

Complete removal

Risk-based corrective action (RBCA)

Other

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

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

Screen Summary

Compliance Determination

On-site toxic, hazardous, or radioactive substances that could affect the health and safety of the children and school staff or conflict with the intended use of the Subject Property located at 851 Peral Road were not found. Civil and Environmental Consultants, Inc. (CEC) conducted a visual assessment of the Subject Property on January 28, 2025, and all chemicals observed on-site were properly stored and kept locked to prevent access by the facility's children. No staining, stressed vegetation, unmarked chemical containers, or spills were noted. An EDR database search report and historical resources were consulted for the Subject Property which is included as an attachment. The database report had no listings for the Subject Property. However, the east-adjointing site beyond the elevated railroad tracks, was listed under the names Kerr-McGee Chemical, Rare Earths Facility and Tronox LLC on several databases including the NPL/ SEMS ROD PRP, and SEMS-Archive (all Superfund related), US Engineering Controls, ICIS, IL Solid Waste Landfill, Impoundment,

underground storage tanks (UST), and the Resource Conservation and Recovery Act (RCRA) Non-Generator/No Longer Reporting databases. These listings all relate to the former Kerr-McGee Company, which operated a mill on this property dating back to 1931, that extracted thorium and nonradioactive elements from ores. Later this property was used to manufacture gaslight mantles, which contain thorium, mesothorium and hydrofluoric acid. The operation was closed in 1973. Elevated radiation levels were subsequently identified on the property, and at 87 additional sites in the area related to contaminated material from the site that had been used as fill material elsewhere. Records of Decision were issued for the site in 2003 to address the site's cleanup. The final radiation cleanup of the groundwater at the Kerr-McGee site is slated to finish in 2026. After the groundwater remediation portion of the decommissioning activities has been completed, the lands associated with those activities at that site will be conveyed to the City of West Chicago for park development. No other sites posing environmental concern for the Subject Property were identified based on review of the database records and historical information by CEC. No radon testing data was available from the facility and no radon mitigation systems are currently in place. Radon testing results for the area of DuPage County where the facility is located (60185) were obtained from the Illinois Department of Public Health (IDPH). Illinois' regulations require radon testing of commercial buildings to be performed by licensed individuals. The cost of radon testing for commercial buildings and daycare centers in the area of the facility is in the range of \$1,500. It was determined that the cost of radon testing would be too great an impact to the small budget for the proposed grant funded projects when compared to the potential to find an exceedance of the guidance level of 4.0 pCi/L. Also, given that the proposed improvements will not require excavation or disturbance of site soils, an increase in existing radon levels is not anticipated. Also, the majority of the proposed projects will be done on the exterior of the building. Therefore, no further assessment for compliance with HUD's radon contamination regulations is required.

Supporting documentation

[R-350-122_Attachments_EDR Repts.pdf](#)

Are formal compliance steps or mitigation required?

Yes

✓ No

Endangered Species

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

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

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

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

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

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

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

Screen Summary

Compliance Determination

This project will have No Effect on federal or state listed species due to the nature of the activities involved in the project. Project plans include updated lighting throughout the interior and exterior spaces of the existing school building, replacing

worn brick pavers around the building, and other safety enhancements such as replacing the existing camera system at the front of the school and in the front and back parking lots. These activities are not expected to impact listed species or their habitat. Therefore, no further assessment for compliance with the Endangered Species Act is required.

Supporting documentation

Are formal compliance steps or mitigation required?

Yes

✓ No

Explosive and Flammable Hazards

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

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

✓ No

Yes

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

✓ No

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

Yes

Screen Summary

Compliance Determination

The proposed project does not involve a hazardous facility that will store, handle or process flammable or combustible chemicals. No existing explosive or flammable hazards or aboveground stationary storage tanks (ASTs) were observed at the project site during the visual inspection performed by CEC on January 28, 2025. Based upon review of the database search report from EDR (provided as an attachment to the Contamination and Toxic Substances Partner Worksheet), there are no active underground storage tank sites registered with the Illinois Office of the State Fire Marshal (OSFM) located within 0.5 mile of the project site. Therefore, no further assessment for compliance with 24 CFR Part 51 Subpart C pertaining to Explosive and Flammable Hazards is required.

Supporting documentation

Are formal compliance steps or mitigation required?

Yes

✓ No

Farmlands Protection

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

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

Yes

✓ No

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

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

Screen Summary

Compliance Determination

The project site is located within an urban area as designated by the US Census. The scope of work does not include new construction, acquisition of undeveloped land or farmland conversion. Project plans include updated lighting throughout the interior and exterior spaces of the existing school building, replacing worn brick pavers around the building, and other safety enhancements such as replacing the existing camera system at the front of the school and in the front and back parking lots. The project is in compliance with the Farmland Protection Policy Act and no further assessment is required.

Supporting documentation

Are formal compliance steps or mitigation required?

Yes

✓ No

Floodplain Management

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

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

Yes

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

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

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

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

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

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

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

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

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

or other HUD assistance.

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

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

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

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

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

Describe:

✓ No

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

Yes

Describe:

✓ No

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

The extent of the FFRMS floodplain can be determined using a Climate Informed Science Approach (CISA), 0.2 percent flood approach (0.2 PFA), or freeboard value approach (FVA). For projects in areas without available CISA data or without FEMA Flood Insurance Rate Maps (FIRMs), Flood Insurance Studies (FISs) or Advisory Base Flood Elevations (ABFEs), use the best available information¹ to determine flood elevation. Include documentation and an explanation of why this is the best available information² for the site. Note that newly constructed and substantially improved³ structures must be elevated to the FFRMS floodplain regardless of the approach chosen to determine the floodplain.

Select one of the following three options:

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

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

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

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

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

³ Substantial improvement means any repair or improvement of a structure which costs at least

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

5. Does your project occur in the FFRMS floodplain?

Yes

✓ No

Screen Summary

Compliance Determination

According to the Federal Flood Standard Support Tool, the proposed project is not located in the coastal or riverine Federal Flood Risk Management Standard (FFRMS) floodplain (see FFRMS Freeboard Value Approach Report), and the project site is located entirely outside the 100-year floodplain and within an area of minimal flood hazard, Zone X (see NFHL FIRMette). The proposed project does not include new construction or conversion of land use. Project plans include updated lighting throughout the interior and exterior spaces of the building, replacing worn brick pavers around the building, and other safety enhancements such as replacing the existing camera system at the front of the school and in the front and back parking lots. No further assessment for compliance with 24 CFR 55.12 pertaining to floodplain management is required.

Supporting documentation

[Federal Flood Standard Support Tool Report.pdf](#)

Are formal compliance steps or mitigation required?

Yes

✓ No

Historic Preservation

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

Threshold

Is Section 106 review required for your project?

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

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

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

Step 1 – Initiate Consultation

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

- ✓ State Historic Preservation Offer (SHPO) Completed

Indian Tribes, including Tribal Historic Preservation Officers (THPOs) or Native Hawaiian Organizations (NHOs)

Other Consulting Parties

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

Coordination with the Illinois Historic Preservation Office (IHPO) on the cultural significance of historical properties in the project area was initiated on February 7, 2025. Response from IHPO on March 3, 2025, indicated that that no historic properties would be affected by the proposed project. The proposed project will not include ground disturbance and as such, no Tribal Historic Preservation Officers (THPOs) were contacted.

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

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

Yes
No

Step 2 – Identify and Evaluate Historic Properties

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

It is assumed that the APE is limited to the area of direct effects at the project site (approximately 3.6 acres).

In the chart below, list historic properties identified and evaluated in the APE. Every historic property that may be affected by the project should be included in the chart.

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

Address / Location / District	National Register Status	SHPO Concurrence	Sensitive Information
----------------------------------	-----------------------------	------------------	--------------------------

Additional Notes:

No previously recorded ("known") historic properties are located within the assumed APE (project site).

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

Yes

✓ No

Step 3 –Assess Effects of the Project on Historic Properties

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

Choose one of the findings below - No Historic Properties Affected, No Adverse Effect, or Adverse Effect; and seek concurrence from consulting parties.

✓ No Historic Properties Affected

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

Document reason for finding:

✓ No historic properties present.

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

No Adverse Effect

Adverse Effect

Screen Summary

Compliance Determination

On February 7, 2025, CEC submitted a consultation letter to the Illinois Historic Preservation Office (IHPO) outlining the results of the literature review (provided under Supporting Documentation). Given the nature of the work, the results of the literature review, and the modern building age, CEC recommended no properties will be affected. On March 3, 2025, the IHPO provided a response to CEC concurring that no historic properties will be affected (provided under Supporting Documentation). Therefore, the proposed project is in compliance with the National Historic Preservation Act (NHPA).

Supporting documentation

[R 350-122 - CR IHPA Response Letter.pdf](#)

[L 350-122 2025 02-07 - CR IHPA Consultation Letter.pdf](#)

Are formal compliance steps or mitigation required?

Yes

✓ No

Noise Abatement and Control

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

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

New construction for residential use

Rehabilitation of an existing residential property

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

An interstate land sales registration

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

✓ None of the above

Screen Summary

Compliance Determination

Proposed project activities do not involve new construction for residential use or rehabilitation of an existing residential property. Project plans include updated lighting throughout the interior and exterior spaces of the building, replacing worn brick pavers around the building, and other safety enhancements such as replacing the existing camera system at the front of the school and in the front and back parking lots. Additionally, the property is located within an urban area as designated by the US Census (see Figure 7). As the project scope is exterior and interior upgrades

to the existing school facility, noise will not be a factor. The project is in compliance with HUD's Noise regulations without mitigation.

Supporting documentation

[350122_EC02_NEPA_Fig7_Census_Urban_Areas.pdf](#)

Are formal compliance steps or mitigation required?

Yes

✓ No

Sole Source Aquifers

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

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

✓ Yes

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

No

Screen Summary

Compliance Determination

Based on the project description, this project includes no activities that would require further evaluation under this section. The proposed project is not located on or near a sole source aquifer (SSA). The nearest SSA is the Allen County Area Combined Aquifer System located approximately 205 miles south of the project site (see Figure 8). No impacts on a SSA would result from the proposed project; thus, no further assessment for compliance with the Safe Drinking Water Act is required.

Supporting documentation

[350122_EC02_NEPA_Fig8_Sole_Source_Aquifer_Map.pdf](#)

Are formal compliance steps or mitigation required?

Yes

✓ No

Wetlands Protection

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

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

✓ No

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

Yes

Screen Summary

Compliance Determination

Proposed project activities do not involve new construction, expansion of a building's footprint, or ground disturbance. Project plans include updated lighting throughout the interior and exterior spaces of the building, replacing worn brick pavers around the building, and other safety enhancements such as replacing the existing camera system at the front of the school and in the front and back parking lots. A desktop analysis was conducted to help identify potential waters of the U.S. (WOTUS) within the parcel boundary. A review of the USGS topographic map and National Hydrography Dataset (NHD) stream layer identified no streams within the parcel boundary (see Figure 5). A review of the USFWS National Wetlands Inventory (NWI) data identified no potential wetlands within the parcel boundary (see Figure 5). No FEMA 100-year floodplains occur within the parcel boundary. The project is in compliance with Executive Order 11990 and no further assessment is required.

Supporting documentation

[350122_EC02_NEPA_Fig5_ENV_REVIEW\(1\).pdf](#)

Are formal compliance steps or mitigation required?

Yes

✓ No

Wild and Scenic Rivers Act

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

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

✓ No

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

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

Screen Summary

Compliance Determination

The proposed project is not located in proximity to a National Wild and Scenic River System River. The nearest designated wild and scenic river is the Middle Fork Vermillion River approximately 105 miles south of the project site (see Figure 9). No impacts on wild and scenic rivers would result from the proposed project; thus, no further assessment for compliance with the Wild and Scenic River Act is required.

Supporting documentation

[350122_EC02_NEPA_Fig9_Wild_and_Scenic_River.pdf](#)

Are formal compliance steps or mitigation required?

Yes

✓ No

Environmental Justice

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

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

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

Yes

✓ No

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

Screen Summary

Compliance Determination

The proposed interior and exterior upgrades to the existing school facility is not anticipated to have a negative impact on the health and welfare of the surrounding communities. As indicated by the other sections of this total Environmental Review, the proposed project would have no significant adverse environmental impacts. No significant disproportionate adverse environmental impacts on minority and low-income residents in the surrounding neighborhoods and local area are anticipated from the proposed safety enhancements to the existing school. The project is in compliance with Executive Order 12898 and no mitigation is necessary.

Supporting documentation

Are formal compliance steps or mitigation required?

Yes

✓ No

